OFFICIAL TRANSCRIPT OF PROCEEDINGS BEFORE THE POSTAL RATE COMMISSION

In the Matter of:	)	
	)	
REQUEST OF THE	)	
UNITED STATES POSTAL SERVICE	)	
FOR A RECOMMENDED DECISION	)	Docket No. R2005-1
ON CHANGES IN RATES OF	)	
POSTAGE AND FEES FOR	)	
POSTAL SERVICES	)	

VOLUME #8D

DESIGNATED WRITTEN CROSS-EXAMINATION OF USPS (PART 2)

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RESPONSE OF UNITED STATES POSTAL SERVICE TO INSTITUTIONAL INTERROGATORY OF THE MAJOR MAILERS' ASSOCIATION

MMA/USPS-2. Please refer to your responses to Interrogatory MMA/USPS-T21-33 C – G (redirected from USPS witness Abdirahman) where you discuss the criteria you consider when suggesting PostalOne! for use by a First-Class workshare mailer and indicate that, as of May 12, 2005, there are 38 workshare mailers utilizing PostalOne!.

A. Is volume the ***primary*** factor in the Postal Service's decision to encourage a workshare mailer to utilize PostalOne!? If not, please explain how a workshare mailer with a "low" volume could possibly provide the savings necessary to justify the expense of setting up PostalOne!

B. How many of the 38 workshare mailers now utilizing PostalOne! elected to purchase PostalOne! directly from the vendor and are responsible for their own maintenance?

C. How many of the 38 workshare mailers now utilizing PostalOne! have "lower volumes" and have purchased a desktop system to facilitate PostalOne!?

D. How many total PostalOne! systems are deployed at the facilities of the 38 workshare mailers now utilizing PostalOne!?

E. Of the total PostalOne! systems now deployed, please state how many are automated systems and how many are desktop systems.

F. How many workshare mailers does the Postal Service estimate will utilize PostalOne! by TY 2006?

G. How many additional workshare mailers does the Postal Service consider to be potential candidates for the automated PostalOne! system?

H. How many First-Class workshare mailers are there?

RESPONSE:

A. No. The Postal Service encourages mailers to participate in the PostalOne! Transportation Management program if their participation provides a positive return on investment (ROI) for the Postal Service. The factors that contribute to the ROI include volume, dispatch quality, handling, processing, collection, transportation, and other factors associated with the induction of mail, which are site specific. Because each site is evaluated separately, it is impossible to say which factor is primary. Mailers with a lower volume can provide savings

necessary to justify the expense of setting up PostalOne! Transportation Management either by avoiding higher costs or by reducing the Postal Service investment by purchasing PostalOne! Transportation Management shipping system equipment themselves.

B – E Consistent with its objection filed on June 6, 2005, the Postal Service views the number of customers receiving Postal Service-provided PostalOne! systems to constitute customer-specific information that it cannot release.

An individual customer may have installed PostalOne! systems that were both provided by the Postal Service and purchased by the customer directly from a vendor. As of June 7, 2005, of a total of 114 deployed PostalOne! systems, 21 systems were purchased by customers and 93 were purchased by the Postal Service. Of the 93 deployed PostalOne! shipping systems purchased by the Postal Service, 36 are automated systems and 57 are desktop systems. All customers are responsible for the maintenance of PostalOne! Transportation Management systems in their facilities.

F. No estimates are available.

G. No estimates are available.

H. In FY 2004, more than 90,100 First-Class workshare mailers entered such mail.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INSTITUTIONAL INTERROGATORY OF THE MAJOR MAILERS' ASSOCIATION

MMA/USPS-3. Please refer to your response to Interrogatory MMA/USPS-T21-33 H (redirected from USPS witness Abdirahman) where you failed to provide the lowest and highest mail volumes for workshare mailers who use PostalOne!. You indicate that providing the highest volume could divulge individual mailer information but failed to provide the lowest volume figure.

A. For FY 2004, please provide the lowest annual volume mailed by a workshare mailer that used PostalOne! during the entire twelve month period.
B. For FY 2004, please provide the average annual volume mailed by the four highest volume mailers that used PostalOne!

RESPONSE:

A. The lowest annual volume for a PostalOne! customer who had a positive volume in each month of FY2004 was 28,512 trays.

B. Objection filed.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INSTITUTIONAL INTERROGATORY OF THE MAJOR MAILERS' ASSOCIATION

MMA/USPS-4. Please refer to your response to Interrogatory MMA/USPS-T21-33 H (redirected from USPS witness Abdirahman). You indicate that, on average, workshare mailers using PostalOne! send out 74,577 trays per month per customer.

A. Please provide an average number of pieces per tray for these mailers. If this information is not available, please provide an average number of pieces per tray for all workshare mailers.

B. Please explain why the Postal Service refrains from counting volume figures given the simple technological procedures to do so.

RESPONSE:

A. The average number of pieces per tray for a PostalOne! customer is unknown. Some conversion factors for various types of mail can be found in Handbook M-32, Management Operating Data System (April 2000) at 55, attached.

B. The PostalOne! Transportation Management program counts trays because PostalOne! Transportation Management systems assigns transportation to trays not pieces. Trays are the unit that the system uses, and the units by which costs are incurred and savings realized.

Linear Rates

Description	Pieces Per Pound	Pieces Per Foot
Letter Mail		
Machine Canceled	35.51	294
Hand Canceled	21.42	92
Machinable Metered	27.88	214
Machinable Metered Bypass	28.25	219
Non-machinable Metered	21.52	136
Non-machinable Metered Bypass	15.07	112
Machinable Mixed Pref	28.55	250
Non-machineable Mixed Pref	21.02	171
Machinable Mixed Standard	18.11	191
Non-machinable Mixed Standard	13.57	156
Foreign Originating	35.56	391
Foreign Destinating	30.98	311
Flats		
Canceled	4.72	115
Metered Pref.	4.18	99
Mixed Pref.	3.57	101
Originating Standard	4.83	115
Foreign Origin	4.59	115
Newspapers	2.78	

4-2.9.2 Converting Parcel Volume Into Pieces—Linear and Pound Rates

To convert parcel volume into pieces, use these rates to count containers:

- pieces per sack = 8.79
- pieces per hamper = 38.7
- pieces per hamper (with extension) = 65.0

To convert parcels for other containers, use these rates:

- bricklloaded (ordinary) = 3 per cubic foot
- bricklloaded (outsides) = 0.7 per cubic foot
- loose loaded (ordinary) = 2 per cubic foot

4-2.9.3 Tare Weight

4-2.9.3.1 Trays and Sacks

The standard tare weight of a hard plastic letter tray is 3.5 pounds; the standard tare weight of a flat tray is 6.8 pounds. The next exhibit shows the average weights for sacks or pouches that can be used when mail is weighed in the sack.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INSTITUTIONAL INTERROGATORY OF THE MAJOR MAILERS' ASSOCIATION

MMA/USPS-6.
Please refer to your response to Interrogatory MMA/USPS-T21-33 I (redirected from USPS witness Abdirahman) where you state that, under the current PostalOne! program, the minimum estimated Postal Service return on the cost of installing the system required for PostalOne! deployment is 20.3 percent.

A. What is the minimum and maximum cost incurred by the Postal Service for installing the PostalOne! systems currently deployed?

B. What is the maximum estimated Postal Service return on the cost of installing a system required for PostalOne! Deployment?

C. What is the average estimated Postal Service return on the cost of installing a system required for PostalOne! Deployment?

D. Please provide the formula that the Postal Service uses to determine its return on the cost of installing a PostalOne! system.

E. Please provide a description of all of the types of savings that the Postal Service anticipates from installing a PostalOne! System.

RESPONSE:

A - C Objection filed.

The average capital investment for a Postal Service purchased desktop system is about $17,000 and for a Postal Service purchased automated system is about $91,000. The ROI is based on the cost borne by the Postal Service which largely consists of the capital investment and program management. While the Postal Service facilitates the installation of PostalOne! systems, installation costs are paid by customers. Typically, these costs include site preparation, power and phone line installation costs, and integration into new or existing automated material handling equipment. The Postal Service pays for operator training, but the customer pays for their personnel to attend training, which is usually held in the customer's facility at the time of installation.

D. Objection filed.

E. The Postal Service realizes labor and transportation cost savings. Labor savings come from reduced processing, collecting, sorting and verification costs. Transportation cost savings come from redirecting mail from air to lower cost surface transportation.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INSTITUTIONAL INTERROGATORY OF THE MAJOR MAILERS' ASSOCIATION

MMA/USPS-7. Please refer to your response to MMA/USPS-T21-33 K (redirected from USPS witness Abdirahman) where you quantify the FY 2006 expected savings from the PostalOne! program as $6,194,735.

A. Please explain how this cost savings figure was derived and exactly what cost savings are included.

B. If this cost savings figure does not include transportation cost savings, please explain why not and provide how much transportation cost savings are expected in FY 2006.

C. Please identify the person who was responsible for calculating this savings figure for purposes of the R2005-1 case and provide a description of the person's qualifications to make such a calculation.

D. Please provide the comparable cost savings for BY 2004 and each fiscal year the PostalOne! program has been fully operational.

E. For each fiscal year the PostalOne! program has been operational, please provide the number of mailers using PostalOne! during all or any portion of such fiscal year.

F. Please state how many PostalOne! mailers the Postal Service expects to have during TY 2006.

RESPONSE:

A. Cost savings per tray are derived from an analysis of the costs to induct letter trays before the installation and activation of a PostalOne! Transportation Management shipping system and the costs after the installation and activation of the system. These savings typically occur in reduced collecting, handling, processing, accepting, transporting and dispatching activities. Specifically, these are costs of loading and unloading trays from containers to containers, and from containers to mail processing and other material handling equipment, and the costs of collecting mail, such as transporting mail form a mailer's production facility to the local Postal Service origin processing unit. Transportation costs are reduced by shifting letter trays from higher cost air transportation to lower cost

surface transportation. These cost savings are used to identify an average savings per tray, per site. Cost savings are estimated by multiplying the cost savings per tray times the estimated number of trays. The total annual savings is the sum of the savings from each individual customer site.

B. The cost savings estimate includes transportation cost savings of $877,179.

C. Objection filed.

D.

PostalOne! Cost Savings

Year	Cost Savings
FY 2002	$1.2 million
FY 2003	$3.3 million
FY 2004	$6.4 million
FY 2005	$6.4 million

E.

Customers Participating in PostalOne! Transportation Management Program

Year	Customers
FY 2002	25
FY 2003	31
FY 2004	37

F. No estimates are available.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INSTITUTIONAL INTERROGATORY OF THE MAJOR MAILERS' ASSOCIATION

MMA/USPS-8. Please refer to USPS witness Abdirahman's response to Interrogatory MMA/USPS-T21-18, which was not redirected by him to any other witness or the Postal Service despite the fact that witness Abdirahman indicated he was not familiar with the Automated Mail Processing System (AMPS).

A. Please describe the AMPS system and explain how the use of AMPS by workshare mailers saves the Postal Service money.

B. Please explain how, if at all, AMPS is integrated into the PostalOne! system.

C. Do all PostalOne! systems installed to date incorporate AMPS or is AMPS an additional, add-on to PostalOne!? Please explain your answer.

D. Are there any workshare mailers who use AMPS as a standalone system or in conjunction with programs, equipment, or systems other than PostalOne!? Please explain your answer fully and include the names of any other programs, equipment, or systems used in conjunction with AMPS.

E. When deriving the cost savings of $6,194,735 expected from PostalOne! in FY 2006, did you include cost savings that result from mailers who perform additional pallet separations that are facilitated by using PostalOne! in conjunction with AMPS? If not, please explain why not. If yes, please explain how such cost savings were determined.

RESPONSE:

A. "Automated Mail Processing System" (AMPS) is a term used by Carter Control Systems, Inc. as a trademark for a product that they sell commercially. Some AMPS purchasers are also Postal Service customers. Thus, AMPS is not a postal program but a shipping system that Carter Controls sells to private industry. Mailers who purchase AMPS systems may use them as a shipping system in the PostalOne! Transportation Management program, but they may also purchase AMPS systems for reasons other than use in the PostalOne! Transportation Management system. Customers also have the option of purchasing systems from other vendors and using those systems in conjunction with PostalOne!

RESPONSE OF UNITED STATES POSTAL SERVICE TO INSTITUTIONAL INTERROGATORY OF THE MAJOR MAILERS' ASSOCIATION

MMA/USPS-9. Please identify by name and title all persons who provided information for the Postal Service's institutional responses to Interrogatories MMA/USPS –T21-16, 17, and 33, as well as responses to Interrogatories MMA/USPS-1-8 and state briefly the contribution of each such person. In addition, please provide the name, title, and autobiographical information for the person that the Postal Service will provide at the hearing to answer parties' questions regarding the PostalOne! program and AMPS.

RESPONSE:

The person coordinating the development of responses to interrogatories from the Major Mailers' Association (MMA) is the Manager of Mailer Enterprise Integration. PostalOne! Transportation Management is a program handled by his work group. Approximately 12 – 15 individuals assisted in some respect with pulling together responses to various MMA questions.

The Manager of Mailer Enterprise Integration is the most knowledgeable individual in the Postal Service regarding PostalOne! Transportation Management. He has overall responsibility for the PostalOne! Transportation Management program and was involved with the program from its inception in 1997 through a proof of concept in 1999, and again from 2001 to the present.

During design and deployment he was responsible for a team of five staff members who engaged customers, prepared and executed appropriate customer agreements, and tested and certified that customer installed systems met minimum performance standards. He was also responsible for working with the necessary range of functional areas within the Postal Service including mail processing, acceptance, collection, mail entry, transportation and engineering to design, integrate, implement and monitor system deployments.

B. If a customer purchases an AMPS system or other PostalOne! compatible system, and wishes to participate in the PostalOne! Transportation Management program, they are incorporated into the PostalOne! Transportation Management System in a way that is similar to other customers, except that they pay for the system rather than using a Postal Service-provided system.

C. AMPS is not an addition or add-on to PostalOne!. It is a trademark name of a product that postal customers who wish to participate in PostalOne! may purchase.

D. The Postal Service is not aware of any other postal programs, equipment, or systems that are used in conjunction with an AMPS system. However, Postal Service customers may determine that AMPS or similar systems are useful in the preparation of mail.

E. The number and type of pallet separations that mailers perform are not directly affected by he use of an AMPS system. Some mailers who use AMPS systems use automated tray sorting equipment to perform pallet separations, and some mailers who use AMPS systems sort trays to pallets manually. See also, the response to MMA/USPS-7(A).

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF MAJOR MAILERS ASSOCIATION

MMA/USPS-10

Please refer to USPS witness Abdul Abdirahman's response to POIR 1 (a) and, specifically, the following passage:

> The Postal Service's across-the-board rate increase proposals do not rely on the results of the special cost studies presented in this case; those results have only been used to estimate final adjustments to the rollforward model. Under these circumstances, the Postal Service used the cost methodology from the R2001-1 case, the BY 1999 nonautomation / automation cost methodology, to develop the cost studies found in USPS-LR-K-48 and USPS-LR-K-110. However, the Postal Service expects to continue consideration of alternative cost study approaches prior to the filing of the next omnibus case.

In addition, please refer to USPS witness Alaf Taufique's response to POIR 1 (b), and specifically, the following passage (emphasis added):

> This filing is designed to fairly and equitably distribute the escrow burden to the classes of mail, and within the mail classes to individual rate categories. The proposed prices are based on the application of a 5.4 percent target increase for each rate category, adhering to the rounding conventions for that particular rate category. In a traditional omnibus case we could potentially reexamine costing methodologies and the alignment of discounts, as well as consider potential classification changes. These issues will be reviewed prior to the filing of the next omnibus rate filing. ***In fact, we believe it is more appropriate to examine the entire array of discounts at that time.***

A. Please confirm that the new delivery cost study sponsored by USPS witness John Kelley in Library Reference LR-USPS-K-67 is one of the "special cost studies" to which USPS witness Abdirahman referred.

B. Please confirm that USPS witness Taufique's proposed application of the 5.4 percent target increase for each rate category does not rely on the derived workshare cost savings that result from the analyses presented in Library References LR-USPS-K-48 (Abdirahman) and LR-USPS-K-67 (Kelley).

Response:

A. Confirmed.

B. Confirmed.

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE MAJOR MAILERS ASSOCIATION

MMA/USPS-11.

Please refer to Interrogatory MMA/USPS-5, which, in relevant part, asked the Postal Service to provide the following information:

> Using other Postal Service data systems that do provide information about First-Class workshare mail volumes by pieces, please provide, separately, the number of letters and the number of cards that the 38 PostalOne! Users mailed during FY 2004.

The complete Postal Service response was as follows (emphasis added):

> This information is not available. For a specific mailer at a specific mail production facility, the Postal Service cannot determine what portion of the mail is processed through a PostalOne! Transportation Management shipping system and what is not.

The Postal Service's answer is not responsive to the question posed by MMA. The referenced interrogatory did ***not*** request the 38 PostalOne! Customers' mail volumes to be broken down between volumes "processed through a PostalOne! Transportation Management shipping system" and volumes sent by other means; the only breakdown MMA sought was between total **letter** volumes and total **card** volumes. Nor did MMA's interrogatory ask for mail volume information to be broken down by "a specific mailer at a specific mail production facility."

With these clarifications, using Postal Service data systems that provide information about First-Class workshare mail volumes by pieces, please provide the total number of First-Class workshare letters and, separately, the total number of First-Class workshare cards mailed during FY 2004 by the 38 mailers you have identified as users of PostalOne!

RESPONSE:

Despite the invective, the requested information remains unavailable. However, in FY2004 the 38 mailers entered 9,431,482,023 workshare letters and 115,771,785 workshare cards using permits held in their own names. Some undeterminable subsets of these pieces were entered using PostalOne.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF MMA

MMA/USPS-12

Please refer to USPS witness Kelley's response to Interrogatory MMA/USPS-T16-19 where he indicates that the rural route volumes shown in Library Reference LR-USPS-K-101, on worksheet "Delivery Volumes", include collected volumes in addition to delivered volumes. Why has the Postal Service computed the "Implicit PO Box Volume" (14,461,233), as shown on that same page by subtracting from total RPW volumes (45,161,746) the sum of (1) city carrier volume delivered (19,503,687), (2) rural route volume delivered (7,714,656) **and** (3) rural route volume collected (3,482,171)?

Response

The established methodology from PRC-LR-7 does this computation. The Postal

Service's LR-K-67 methodology does not compute Implicit PO Box Volume.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF MMA

MMA/USPS-13

Please refer to USPS witness Kelley's response to Interrogatory MMA/USPST16-22 C where he explains how he estimated the First-Class metered mail letter volumes that were delivered by city carriers and rural carriers and the First-Class metered mail letter volume delivered to post office boxes. If the rural carrier volume that he used in his computation, 10,276,825, includes collected volumes, then isn't the "BY P.O. Box Volume" figure of 13,106,846 incorrect? If the figure of 13,106,846 is not correct, please provide the correct figure for the implicit volume delivered to post office boxes. If that is the correct figure, please explain why the volume of letters collected, which is included in the rural carrier volume figure of 10,276,825, should be subtracted from total letters delivered in order to compute the implicit volume delivered to post office boxes.

Response

In calculating the ratios of .0429 for city, 0.251 for rural, and 0.320 for P.O. Box, the response to MMA/USPS-T-16-22C assumed that these ratios apply to both total delivered volume only as well as to total delivered plus collected volume. Thus, it was implicitly assumed that the ratio of delivered volume to delivered plus collected volume is likewise the same for city, rural, and P.O. Boxes. Note that a problem inherent to all such allocations of national level volumes to individual modes is that the only available volume data that can be used to derive such allocations, CCCS and RCCS, provide incomplete counts of city and rural volumes. CCCS excludes all mail volumes collected from city letter-route collection boxes, and it excludes all special-purpose-route delivered as well as collected mail. RCCS likewise excludes all mail collected from USPS collection boxes at rural post offices or other locations. Thus, any set of proportions used to allocate national-level volumes across delivery modes must be viewed as tentative and uncertain.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE MAJOR MAILERS ASSOCIATION, REDIRECTED FROM WITNESS ABDIRAHMAN

MMA/USPS-T21-16. Please describe your understanding of Postal One Phase I and explain how this form of worksharing saves the Postal Service money in terms of both reduced processing and transportation costs.

RESPONSE:

"Phase I" of the Postal Service's deployment of PostalOne! was a limited introduction of PostalOne! to gain operational experience prior to the wider scale ("Phase II") deployment of PostalOne!. At this time, there is no operational distinction between customers who implemented PostalOne! during Phase I and those who implemented PostalOne! during Phase II. Please see the response to MMA/USPS-T21-33.

While PostalOne! may facilitate worksharing, installation of PostalOne! in and of itself does not consist of "worksharing." "Worksharing" includes presortation, making mail automation compatible, and dropshipping mail closer to destination and generally involves customers performing work that the Postal Service would otherwise do. To the extent that PostalOne! customers perform worksharing activities, the costs avoided by that worksharing are incorporated in the cost avoidance models presented by witnesses Abdirahman, Miller and Mayes. However, these models do not explicitly distinguish worksharing performed by PostalOne! customers from worksharing performed by other customers.

Additionally, installation of PostalOne! may allow customers and the Postal Service to reach agreement on a local level that, for example, allows the customer to enter mail later than normal or tender mail at alternate locations. While these

agreements may offer benefits to the Postal Service, often they are also beneficial to the customer because, for example, they provide improved service or additional time to work the mail in the customer's plant.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF MAJOR MAILERS ASSOCIATION
REDIRECTED FROM WITNESS ABDIRAHMAN

MMA/USPS-T21-25

On page 6 of your testimony, you discuss the Multi-Line Optical Character Reader Input Sub System (MLOCR-ISS) and Remote Computer Read (RCR) finalization rate as reaching 92.3% for the test year.

A. Please provide the actual MLOCR-ISS rates for each accounting period since FY 2002 separately for (1) machine printed addresses and (2) handwritten addresses.
B. Please provide the actual RCR rates for each accounting period since FY 2002 separately for (1) machine printed addresses and (2) handwritten addresses.
C. Did the Postal Service meet its goal of a combined 92.3% rate for TY 2003 in R2001-1? If not, why not?

RESPONSE:

A. The data are not available.

B. The data are not available. Each individual site has the information daily but that information is not tracked nationally by accounting period.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION
REDIRECTED FROM WITNESS ABDIRAHMAN

MMA/USPS-T21-26

In R2000-1, USPS witness Campbell described the Permit system as "an on-line system, which gives authorized USPS employees rapid access to advance deposit accounting information. The system controls advance deposit trust fund deposits, withdrawals, and daily balances for each Post Office permit account. The daily tasks the PERMIT system accomplishes are record keeping, account tracking, postage calculation, withdrawal and deposit posting, data edits, funds verification, customer assistance information searches, daily trial balance calculations and associated mail volume information development." *See* R2000-1, Tr. 14/5918.

A. Please provide, for the base year or the most recent 12-month period for which data are available, a list of all First-Class mailers who send more than 1 million pieces per year. Please provide this information in the same format used for Library Reference USPS LR-I-331 in R2000-1, that is, broken down separately for 1-ounce letters, 2-ounce letters, and cards. Please note that Library Reference USPS LR-I-331 in R2000-1 reports information for QBRM recipients, but this interrogatory relates to First-Class workshare mailers' ***outgoing mail***.

B. MMA understands that as of FY 2000, approximately 52% of First-Class workshare mailings consisted of fewer than 1,500 pieces. Please verify the accuracy of this description of the First-Class workshare market and update the percentage to BY 2004.

C. Please provide, for the base year or the most recent 12-month period for which data are available, whatever data is available that breaks down First-Class workshare letters as to the number of mailings and the volume of each mailing.

RESPONSE:

A. The requested data are available by permit number, rather than by mailer. The attached electronic workbook (MMA-USPS-T21-26 - FCM Million.xls) provides a listing of the First-Class permit numbers that sent more than 1 million First-Class Mail workshare letters and cards in FY 04. The permit numbers have been encoded to protect the identity of the mailers.

B. The Postal Service does not collect and maintain statistics on all First-Class Mail mailings. The requested statistics are only available for transactions entered at PERMIT (FY00) or PostalOne (FY04) equipped

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION
REDIRECTED FROM WITNESS ABDIRAHMAN

offices. In the FY 00 PERMIT system database 1.353 million, or 40.8 percent of, First-Class Mail workshare transactions contained less than 1,500 pieces. In the FY 04 PostalOne database 1.613 million, or 42.9 percent of, First-Class Mail workshare transactions contained fewer than 1,500 pieces. For this analysis a transaction is defined as a postage statement record in ether the PERMIT or PostalOne database.

C. The below table presents the distribution of First-Class Mail workshare letter and card transactions and volume by transaction size. Please note that the transaction counts in the table differ from the transaction counts in part B of this question. In part B of this question, information is requested on all workshare transactions. In part C the distributions are only requested for workshare letters. The table includes both cards and letters due to the fact that 15,209 transactions contained both letters and cards

FY 04 PostalOne Database
First-Class Mail Workshare Letters and Cards
By Mailing Size

Transaction Size (000's)	Transaction Count	Total Volume
0.0 - 0.5	282,563	79,586,587
0.5 - 1.0	619,949	454,228,286
1.0 - 1.5	371,967	457,981,952
1.5 - 3.0	594,626	1,281,009,388
3.0 - 5.0	382,254	1,508,477,571
5.0 - 25.0	697,275	7,635,810,294
25.0 - 50.0	154,129	5,405,950,665
50.0 - 100.0	88,926	6,209,134,327
100.0 - 200.0	48,186	6,683,192,305
200.0 - 500.0	29,997	9,214,514,896
500.0 - 750.0	5,838	3,516,475,640
Over 750	5,857	7,796,166,244
Total	3,281,567	50,242,528,155

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

POSTAL RATE AND FEE CHANGES **Docket No. R2005-1**

Printout Of Excel File MMA-USPS-T21-26_-_FCM_Million.xls Provided By Postal Service As Part Of The Institutional Response To Interrogatory MMA/USPS-T21-26

FY 04 First-Class Mail
Listing of Permit's with more than 1 million
First Class Workshare Letters and Cards
by Ounce Increment

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT2513		1,110,345,828	59,991,755												1,170,337,583
PMT1517		639,327,113	202,744,068												842,071,181
PMT1453		706,581,469	3,141	6,268											706,590,878
PMT1554		531,938,171	265,924	3,893											532,207,988
PMT1222	40,179	468,636,836	197,787	20,540											468,895,342
PMT1850	98,575	427,063,055	2,495,779												429,657,409
PMT0456		374,640,856	41,832	2,109											374,684,797
PMT2894		372,181,688	1,237,951	50,773											373,470,412
PMT3272	1,419	349,818,679	433,885	964,504											351,218,487
PMT2228	573,727	342,752,504	28,510	93,113											343,447,854
PMT1115		272,210,111	37,193,254												309,403,365
PMT2093		296,270,583	3,469,905	11											299,740,499
PMT0126		286,050,304	13,363,238												299,413,542
PMT1973	54,247	291,531,198	4,776,360												296,361,805
PMT1406	784	295,135,776													295,136,560
PMT0950	30,666	290,086,470	5,807												290,122,943
PMT2526	338,148	289,111,163	164,984	238,617	11,480										289,864,392
PMT3349		288,126,421	7,348												288,133,769
PMT2247	14,963	273,831,125	109,724	96,322	17,669										274,069,803
PMT1755		259,991,730	17,368												260,009,098
PMT2539	547	252,244,039	5,402,006												257,646,592
PMT1460		247,831,035	9,481,989												257,313,024
PMT0379	2,191,062	234,552,443	19,650,238	395											256,394,138
PMT2855	801,016	248,683,467	39,064												249,523,547
PMT1718	152,737	243,355,955	93,608												243,602,300
PMT1556		228,408,656	26,854	9,216											228,444,726
PMT0070		219,700,930	4,230,798												223,931,728
PMT0883		206,925,780	14,327,981	110											221,253,871
PMT0248	7,103	212,984,778	23,992	67,220											213,083,093
PMT3287		199,685,715	10,563,019	72,862											210,321,596
PMT0571		207,868,180	38,310												207,906,490
PMT1000	814	205,530,288	31,417	18,875	81,025										205,662,419
PMT0684		186,698,134	30,019												186,728,153
PMT1880	148,236	184,506,629	243,795	188,230	1,756										185,088,646
PMT0906	5,187,000	174,534,115	2,916,330												182,637,445
PMT2568	205,929	181,319,146	5,369												181,530,444
PMT2523	1,401,449	178,638,926	14,156	44,981											180,099,512
PMT0841	12,079	177,631,076	17,648												177,660,803
PMT2258	17,447	177,071,859	44,435	5,606	16,966	17,110									177,173,423
PMT2488		174,854,917	712,260												175,567,177
PMT2550	4,612	167,677,507	7,927												167,690,046
PMT1528	39,396	160,233,289	6,822,641	841											167,096,167
PMT3271		166,586,192	292,640	108	126	547									166,879,613
PMT2844		166,220,790	37,930												166,258,720
PMT3123		150,685,287	8,810,763												159,496,050
PMT2100		156,540,632	29,803	2,350											156,572,785
PMT1909		155,310,740	75,537	40											155,386,317
PMT1929		151,685,466	3,248,244												154,933,710
PMT2476		149,158,955	4,709,206	6,473	12,225										153,886,859
PMT0991		148,966,873	5,611		330,250	1,483,529									150,786,263
PMT2555		144,523,286	5,225,748												149,749,034
PMT2155		92,294,738	50,785,066	1,718,918	10,832										144,809,554

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT1705	515	143,912,828	133,719	18,335	74,349										144,139,746
PMT3327		139,933,603	3,652,160	42,482	17,482										143,645,727
PMT2673	312,732	142,761,482	23,299												143,097,513
PMT0988		139,858,187	549,959												140,408,146
PMT2106		115,641,599	23,444,525	7,313											139,093,437
PMT0202		138,821,885	185,428												139,007,313
PMT2966		117,110,509	21,100,514												138,211,023
PMT1802		135,673,366													135,673,366
PMT2680		135,115,335	252,634												135,367,969
PMT0485	18,866,973	94,639,132	15,970,819	873,132											130,350,056
PMT2332		123,379,995	6,174,833	10,579											129,565,407
PMT2733		128,926,945													128,926,945
PMT0918	154,294	124,105,594	27,019	11,215											124,298,122
PMT3296		102,552,957	20,380,717	713,130											123,646,804
PMT1137		119,542,891	3,967,152	140											123,510,183
PMT2871		119,641,637	1,186	1,462											119,644,285
PMT0781	64,042	117,872,613	60,560	85,455											118,082,670
PMT2036	7,576	116,535,253	53,819		13,279	2,281									116,612,208
PMT0818		116,299,922	36,972												116,336,894
PMT0820	303,312	114,317,402	8,721	2,622	5,596										114,637,653
PMT2380		110,340,524	75,278												110,415,802
PMT2586		110,263,341													110,263,341
PMT0497		91,191,581	18,084,837	11,668	753										109,288,839
PMT2816		109,270,046													109,270,046
PMT0904	458,070	104,671,996	4,168	18,338											105,152,572
PMT1089		101,688,930	51,199												101,740,129
PMT1150		100,566,051	20,892	21,249											100,608,192
PMT0068		100,214,837													100,214,837
PMT2713		99,254,962	4,560	20,440											99,279,962
PMT2741		89,002,642	6,709,503												95,712,145
PMT0980	19,725	94,695,773	613,331	146,074	431										95,475,334
PMT1436	370,714	59,087,162	34,321,175	876,783	2,130										94,657,964
PMT2394	867,491	85,587,486	6,599,892	331											93,055,200
PMT1668		92,924,183													92,924,183
PMT0861		92,236,932	10,152												92,247,084
PMT1871		91,643,816													91,643,816
PMT1095		91,049,334													91,049,334
PMT2970		89,879,881	73,027	4,639		465	2,085								89,960,097
PMT1943	345,880	89,269,595	12,815			1,858	52,243	27,408							89,709,799
PMT0978		89,528,578	5,876	11,425							1,722				89,547,601
PMT0156		89,147,432													89,147,432
PMT0225	148,344	86,165,843	2,625,042												88,939,229
PMT2418		88,129,873	144,870												88,274,743
PMT2632	156,692	88,069,524	18,162		3,791	17,008									88,265,177
PMT0082		87,046,147	1,494												87,047,641
PMT0585	3,567	86,343,641	7,355	5,288	8,242	418	1,265	921							86,370,697
PMT1106		73,668,503	11,289,156	56,447	2,615										85,016,721
PMT1385		82,861,419	1,690,240												84,551,659
PMT2622		84,174,980	2,274	237											84,177,491
PMT2437		83,176,785	53,784												83,230,569
PMT2318	5,866,389	76,349,783													82,216,172
PMT1288	17,278	80,101,933	112,842	495,137	101										80,727,291
PMT3061		71,755,627	8,961,391												80,717,018
PMT2291		58,494,613	20,921,827	228,880											79,645,320
PMT0875	110,312	79,010,997	15,300												79,136,609
PMT2444	1,754	78,392,901	1,230	657	2,942										78,399,484
PMT1481		78,120,608	460												78,121,068
PMT3066	80,646	77,125,718	133,226	9,259	184	476									77,349,509
PMT1612		77,292,316	3,609												77,295,925

	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
:2		77,168,841	5,796			1,270	5,699								77,181,606
:3		74,750,405	423,439												75,173,844
:6		74,796,414	3,074												74,799,488
:3		74,729,163													74,729,163
:3		72,434,255	1,198,034	8,069											73,640,358
:5		73,288,872	62,754	204,035	975										73,556,636
:2		73,186,776	133,257	48,272											73,368,305
:5	4,431	67,923,457	5,210,887	75,587											73,214,362
:8		71,750,535	9,320	10,951	163										71,770,969
:0		71,351,638		1,171	5,252										71,358,061
:5	21,465	69,334,877	85,044												69,441,386
:3	2,929	68,998,453	9,179												69,010,561
:2		68,923,153	16,817												68,939,970
:4		68,250,606	409,268												68,659,874
:8		68,312,068	90,073	1,043											68,403,184
:5		68,132,130													68,132,130
:1		67,784,145													67,784,145
:9	5,687	66,986,423	112,927												67,105,037
:2	110,141	66,301,199	213,412	10,649											66,635,401
:1	5,931,863	55,981,177	4,171,939	180,013	147	655									66,265,794
:9	6,292	65,489,185	72												65,495,549
:0	27,736	65,062,570	41,045												65,131,351
:2		62,382,792	2,663,486												65,046,278
:4	78,433	64,886,595													64,965,028
:7		64,789,493	7,554												64,797,047
:9	1,308	64,234,376	34,331	136,769											64,406,784
:3		62,167,619	1,852,139	210,108									1,193	760	64,231,819
:0		83,197,177													83,197,177
:8		62,008,380	155,242	241,685	7,474										62,412,781
:4	970,356	60,292,790	266,612	733,976	297										62,264,031
:9	7,242,330	53,253,118	1,486,901												61,982,349
:3	10,395	61,408,054	39,801	177,894											61,636,144
:3	322,723	61,050,871	15,402												61,388,996
:9		60,961,702													60,961,702
:4		60,340,650	100,686												60,441,536
:9		60,213,995	6,101	1,445											60,221,541
:9		60,123,385	12,450												60,135,835
:7	18,615	59,879,995	52,641												59,951,251
:7		59,824,408													59,824,408
:8		59,692,701	16,169												59,708,870
:6		59,448,452	12,250												59,460,702
:4		59,370,946													59,370,946
:9	21,803	59,245,992	9,307	22	2										59,277,126
:0		59,245,785													59,245,785
:3	5,169	58,677,760													58,682,929
:0		41,964,847	15,802,114	703,606	65										58,470,632
:3		58,227,285	34,007												58,261,292
:4		58,073,235													58,073,235
:5		57,663,754													57,663,754
:0	5,116	57,536,474	2,387			70	124								57,544,171
:9		55,071,687	2,368,822	256											57,440,765
:8	36,809,323	20,366,497	519												57,176,339
:9		56,807,511	239,807	7,776	1,311										57,056,405
:9	33,225	56,938,975	1,549												56,973,749
:6		56,751,801	2,725												56,754,526
:7	41,198	50,773,014	5,754,071	158,638											56,726,921
:5		56,422,460	270,552												56,693,012
:8		56,270,370													56,270,370
:9	393,269	55,696,152													56,089,421

Part Num
PMT
PMT
PMT

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2071		55,466,441	42,950												55,509,391
PMT2922	5,350,729	48,024,521	1,241,239												54,616,489
PMT0463	2,618,160	51,833,690													54,451,850
PMT3094		54,325,065	27,003												54,352,068
PMT2340		54,136,804													54,136,804
PMT0097		53,863,198													53,863,198
PMT0849	299,621	53,319,344													53,618,965
PMT0945		52,759,536	300,099												53,059,635
PMT1475		36,587,970	16,085,121												52,673,091
PMT1156		52,223,324	4,821												52,228,145
PMT0377		51,966,162	226,536	60											52,192,758
PMT2660		52,113,476													52,113,476
PMT2790		39,257,196	12,623,523	115											51,880,834
PMT2018	39,957,718	11,604,650													51,562,368
PMT1351		51,320,683	9,761												51,330,444
PMT1210		50,846,651	4,750												50,851,401
PMT1419	9,915	50,052,039	321,283												50,383,237
PMT0400		49,220,482	15,822												49,236,304
PMT1586		34,093,295	14,580,703	463,952	10,027										49,147,977
PMT3237		37,633,264	11,058,010												48,691,274
PMT1079	230,635	47,899,022	473,649	5											48,603,311
PMT1783	1,655	47,583,974	206,012	452,909	841										48,245,391
PMT2570	1,630	47,928,473	2,198												47,932,301
PMT0468		46,478,224	1,081,574	89,928	365	665									47,648,756
PMT3117		47,578,965	33,134												47,612,099
PMT3004	5,504	47,364,785	71,031												47,441,320
PMT1703	2,454	47,042,792	5,094	3,756											47,054,096
PMT2507		46,695,143													46,695,143
PMT1145		45,854,353	764	20,705	92,883										45,968,705
PMT3134		45,779,086	41,440	7,444											45,827,970
PMT1916		45,553,782	128,419	32,860	114	4,635	835								45,720,645
PMT2409		45,681,235	177												45,681,412
PMT1875		33,273,188	11,673,147	271,366											45,217,701
PMT0173		45,165,374													45,165,374
PMT0396	2,168	43,678,531	1,369,601	52											45,050,352
PMT2073		44,869,612													44,869,612
PMT0765		44,416,165													44,416,165
PMT0737		44,195,882	10,512	44,840											44,251,234
PMT1530	849	44,165,004	64,123												44,229,976
PMT2854	695,987	43,173,284	144,322	14,609											44,028,202
PMT2021	81,427	43,772,264													43,853,691
PMT0479	1,541,062	40,360,536	1,927,489												43,829,087
PMT1330		43,752,446	1,067	271											43,753,784
PMT0505	3,534,766	40,107,346	4,591												43,646,703
PMT0124		43,559,768	19,023												43,578,791
PMT3333	333,293	40,298,128	2,670,541												43,301,962
PMT2308		43,129,475													43,129,475
PMT1437		43,121,851	6,571												43,128,422
PMT3234	19,916	43,062,057	2,493	6,625	29,712										43,120,803
PMT3111		43,074,701	28,785		6,659	6,718									43,116,863
PMT1054		42,858,883	4,194												42,863,077
PMT1003		42,800,048	11,171												42,811,219
PMT2362		39,423,560	3,302,512	292											42,726,364
PMT2837		42,151,689													42,151,689
PMT2816		41,279,712	26,947	2,982											41,309,641
PMT2417		41,011,622	964												41,012,586
PMT1284		40,867,201													40,867,201
PMT1498	1,480	40,832,077													40,833,557
PMT0769	2,788	40,811,888	3,211												40,817,887

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT0612		40,773,057	36,922												40,809,979
PMT0277	28,985	40,701,416	5,513												40,735,914
PMT0731		40,468,404	12,251												40,480,655
PMT2831		40,478,137													40,478,137
PMT2865		40,268,008													40,268,008
PMT1032		34,220,827	5,789,974	476											40,011,277
PMT3001		33,727,312	6,168,075	20,233	4,878										39,920,498
PMT1665	39,142,966	119,140													39,262,106
PMT3294	13,294	37,636,547	1,576,426												39,226,267
PMT1544		39,097,304	57,534												39,154,838
PMT0912		38,721,284	3,427												38,724,711
PMT1235		38,607,614	1,456			3,937	4,530								38,617,537
PMT2597	58,125	38,386,511													38,444,636
PMT2602		38,071,303													38,071,303
PMT0877		22,112,221	15,534,446	305,554	294										37,952,515
PMT0943		37,506,905	213,129												37,720,034
PMT3303	438,448	36,914,446	363,546	156											37,716,596
PMT1358	2,367	37,668,283	29,883	5,666											37,706,199
PMT1838	18,789	37,321,686	142,591												37,483,066
PMT3291		37,282,766													37,282,766
PMT0074		37,204,481	8,803												37,213,284
PMT2672		27,877,666	9,188,438	12,692											37,078,796
PMT0137		36,815,285	175,963	27											36,991,275
PMT1265		36,502,335	460,203	15,132	3,502										36,981,172
PMT0926	32,824,383	3,774,769	366,903												36,966,055
PMT1026		36,772,985													36,772,985
PMT3007		28,150,189	7,979,196	151,944											36,281,329
PMT0098		36,121,622	54,977												36,176,599
PMT0111		36,134,311													36,134,311
PMT1883		35,771,049	69,052	54											35,840,155
PMT0524		35,656,017	5,443												35,661,460
PMT2667		35,657,073													35,657,073
PMT0164	257,417	35,337,211	14,584												35,609,212
PMT0766		35,412,369	21,542	68,659											35,502,570
PMT0565	5,391,778	26,357,407	3,649,964	1											35,399,150
PMT2435	1,427,019	33,865,948	28,326												35,321,293
PMT3279		35,276,136	7,566	6,782											35,290,484
PMT1347	18,542,283	16,685,924													35,228,207
PMT0259	33,276,571	1,861,119													35,137,690
PMT3275		35,084,111													35,084,111
PMT0054	5,131	35,006,212	46,850	3,464	15,541										35,077,198
PMT2467	74,018	25,507,266	8,664,102	387,617	345,200										34,978,203
PMT0155		34,972,774													34,972,774
PMT2757	21	34,940,887	1,402												34,942,310
PMT3105		34,700,677	216,059												34,916,736
PMT0257	3,764,192	30,086,150	1,004,962	26,388	1,069										34,882,761
PMT1511	3,798	34,825,428	17,578												34,846,804
PMT2320	2,426,890	32,362,560													34,789,450
PMT1297	376,292	34,186,544	13,361	52,834	10,662										34,639,693
PMT2261		34,615,250	11,495												34,626,745
PMT0835		34,544,213													34,544,213
PMT3348		34,321,210	84,248												34,405,458
PMT1728		34,341,001	4,262												34,345,263
PMT0863		33,412,134	620,992												34,033,126
PMT3202		31,900,089	1,649,751	47,678											33,597,518
PMT2538	33,461,114														33,461,114
PMT1751		33,402,677													33,402,677
PMT0003	651,612	32,358,881	230,594												33,241,087
PMT1334	600,570	32,500,821													33,101,391

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT0489		33,085,997													33,085,997
PMT2196		32,402,794	572,110												32,974,904
PMT0735	21,382,183	11,565,392													32,947,575
PMT3163	132,864	29,556,050	3,221,396	17											32,910,327
PMT0200		32,806,831													32,806,831
PMT1350	21,609	32,690,388	47,170	4,145											32,763,312
PMT1829		32,127,966	529,873	22,125	1,539										32,681,503
PMT0788	18,726,944	13,921,806													32,648,750
PMT2988		32,323,022	58,557	282,468											32,644,047
PMT1049		31,883,742	418,036												32,301,778
PMT0753		32,293,089													32,293,089
PMT0217		31,201,123	1,066,226	426		1,838	793								32,270,406
PMT0721		31,561,570	615,703	48,711											32,225,984
PMT2800	261,659	30,945,982	1,007,705												32,215,346
PMT2207		32,089,867	43												32,089,910
PMT1781		31,990,098													31,990,098
PMT0788		31,825,725	100,098												31,925,823
PMT2747	30,130,662	1,648,283													31,778,945
PMT1225		31,661,778													31,661,778
PMT2206		31,629,984													31,629,984
PMT2508		30,574,501	843,644												31,418,145
PMT3113		31,414,367													31,414,367
PMT1339		21,941,135	9,294,529												31,235,664
PMT3012		30,987,749													30,987,749
PMT2898	1,679,613	28,582,035	714,326												30,975,974
PMT1116		30,638,554	299,765												30,938,319
PMT2277	78,375	30,583,671	163,124	2,448											30,827,618
PMT1464	2,566,676	20,263,330	7,933,751	16											30,763,773
PMT2611	27,648	30,722,691	2,822	3,157											30,756,318
PMT0902	29,314,064	1,285,888	6,986												30,606,938
PMT2857	1,878,680	28,082,757	583,831	3,139											30,548,407
PMT2337		30,497,248	10,540												30,507,788
PMT0442		30,459,154	7,300												30,466,454
PMT2122	48,652	30,310,349	987												30,359,988
PMT1085		30,317,161	14,045												30,331,206
PMT3293	719	29,035,159	1,220,453	50,575											30,306,906
PMT1448		26,776,430	3,401,181	56,887	413										30,234,911
PMT0386		7,949,662	22,199,150	73,952								495	837		30,224,096
PMT0674		30,221,503													30,221,503
PMT1785		30,109,325													30,109,325
PMT1382		29,661,683	14,549												29,676,232
PMT0575	20,855,328	8,736,206	2,940												29,594,474
PMT1503	48,000	29,449,450	25,448	11,244	3,186										29,537,328
PMT0557	4,105,057	25,234,290	63,741												29,403,088
PMT3350		29,258,890	630												29,259,520
PMT2834		29,227,659	14,667												29,242,326
PMT0335		23,997,328	4,797,736	83,477	50,431										28,928,972
PMT0587		28,851,017	4,942												28,855,959
PMT2964		28,579,403													28,579,403
PMT2388		28,530,965	14,473												28,545,438
PMT2327		28,016,331	384,004	25,053											28,425,388
PMT2133		28,365,567	4,003												28,369,570
PMT1341	326,404	17,806,890	10,066,477	29,343	86,913										28,316,027
PMT1302		17,170,664	10,909,862	213,782											28,294,308
PMT2098		28,170,908	4,438	98	439										28,175,883
PMT1673		27,816,083													27,816,083
PMT3328		27,556,834													27,556,834
PMT1008		27,535,721	5,036												27,540,757
PMT0518		25,667,456	1,858,949	864											27,527,269

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2813		27,491,234													27,491,234
PMT0129		21,779,550	5,497,385	144,131											27,421,066
PMT1716		27,166,852	2,969												27,169,821
PMT2884		27,058,147	7,971												27,066,118
PMT3335	5,111	26,629,310	273,021												26,907,442
PMT0258	3,073,896	23,692,267	11,667			171	765								26,778,766
PMT0014	1,174,145	25,368,423	140,488												26,683,056
PMT2298		19,324,180	7,075,568	99,477											26,499,225
PMT1179	21,741,548	4,668,298	8,922												26,418,768
PMT0301		26,144,239	274,045												26,418,284
PMT0190	12,700	24,486,866	1,771,555	98,608	3,610										26,373,339
PMT2851		26,268,359	64,787												26,333,146
PMT0616		26,329,686													26,329,686
PMT2001		26,215,844	447		2,671	892									26,219,854
PMT0868	443,838	25,719,246													26,163,084
PMT2873	37,530	24,730,958	1,379,208												26,147,696
PMT1633		25,744,988	118,264	28,421											25,891,673
PMT1279		24,317,558	1,553,259	3,357											25,874,174
PMT0670	790,702	25,076,653													25,867,355
PMT2886	25,861,763														25,861,763
PMT0914	10,081	25,832,645	514	2,305											25,845,545
PMT0630		25,793,020	7,133												25,800,153
PMT2226	116,824	25,447,610	117,347												25,681,781
PMT0421		25,620,780	10,766	47,358											25,678,904
PMT2765		25,469,930													25,469,930
PMT0169	11,813	25,374,796	8,774				14,701	47,258							25,457,342
PMT2297	751,494	24,363,448	174,261	15,865											25,305,068
PMT1936		25,259,951													25,259,951
PMT2248	2,298,120	22,891,762													25,189,882
PMT0197		25,165,051	571												25,165,622
PMT2619	319,582	24,617,473	2,580												24,939,635
PMT0021	1,529	24,687,431	186,286												24,875,246
PMT2111		24,841,377													24,841,377
PMT1471	10,813	23,612,047	1,176,786												24,799,646
PMT2138		24,660,482	6,531												24,667,013
PMT1277		24,653,637													24,653,637
PMT1317		24,481,590	25,733												24,507,323
PMT2706		23,609,101	818,441	82											24,427,624
PMT2935	24,423,594														24,423,594
PMT1260		24,413,310													24,413,310
PMT2318	846	24,300,364	2,627												24,303,837
PMT1201		24,260,374													24,260,374
PMT3174		24,056,989	145,606	182											24,202,777
PMT0279		24,197,240													24,197,240
PMT2391		24,101,949	87,189												24,189,138
PMT1041	2,704,672	20,740,751	322,703		2,390	10,721									23,781,237
PMT2150		22,877,346	803,809												23,681,155
PMT2208	969,616	22,601,994	33,837	6,856											23,612,303
PMT2115		23,488,916													23,488,916
PMT0896		23,231,298	228,889												23,460,187
PMT1762	153,423	22,818,383	468,097												23,439,903
PMT2868		11,391,250	11,482,600	452,643	358										23,326,851
PMT1737		23,228,855	47,221	3,475											23,279,551
PMT0899		23,171,947	7,525												23,179,472
PMT2797		20,796,723	2,370,685	44											23,167,452
PMT2402	24,590	23,052,349	70,273												23,147,212
PMT1018		22,889,297	208,341												23,097,638
PMT2453		21,563,051	1,308,784	31,451											22,903,286
PMT2426		22,556,614	57,679	249,479											22,863,772

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT3197		22,856,380													22,856,380
PMT0798		21,710,779	1,123,773	2,313	10,374										22,847,239
PMT2457	1,840	21,641,448	1,190,790	80											22,834,158
PMT2275	394,504	22,431,872	3,391												22,829,767
PMT1584	51,393	20,626,943	2,149,651												22,827,987
PMT1217		22,617,510	106,186												22,723,696
PMT0628		22,609,942	10,817												22,620,759
PMT0681		20,615,271	606,344	266,589	938,473	3,125									22,429,802
PMT2969		22,253,479	1,750												22,255,229
PMT1340		21,929,499	38,489												21,967,988
PMT0134	27,670	21,918,081	20,204												21,965,955
PMT2950		21,860,195													21,860,195
PMT0424		21,826,906													21,826,906
PMT0048		21,801,576	2,342												21,803,918
PMT3060		15,580,087	6,193,331												21,783,418
PMT1788	1,222,465	14,238,651	6,305,379												21,766,495
PMT1912		21,739,384	6,034												21,745,418
PMT0851		20,598,969	971,736	148,193											21,718,898
PMT3168		21,714,126													21,714,126
PMT2805	1,305,701	20,184,561	215,386												21,705,648
PMT3071	4,287,506	17,412,996	2,135												21,702,637
PMT1474	3,583	21,665,610													21,669,193
PMT2605		21,668,772													21,668,772
PMT1690		21,501,052	67,161												21,568,213
PMT0662		21,534,782	2,737												21,537,519
PMT0827	1,011	21,450,829	13,795	1,146								1,853			21,468,634
PMT2056		20,468,539	954,035												21,422,574
PMT2842		10,513,127	10,366,944	423,555	919										21,304,545
PMT1218		21,282,153													21,282,153
PMT3035		21,207,620	73,911												21,281,531
PMT1901	11,003	20,059,191	1,146,221												21,216,415
PMT0515		1,181,634	4,430												21,186,064
PMT1797	9,441	21,067,422	98,679	1,102											21,176,644
PMT1997	2,851	20,582,786	539,672	807	462										21,126,578
PMT0984	39,878	18,599,850	2,418,561												21,058,289
PMT0029		20,999,862	1,014												21,000,876
PMT2203		20,946,653	3,002												20,949,655
PMT0157	5,862	20,040,576	548,581												20,595,019
PMT3325		20,483,003	3,733												20,486,736
PMT2633		20,315,009													20,315,009
PMT3165	164,243	20,044,573	5,062	16,736	75,048										20,305,682
PMT1991		20,135,347	10,751												20,146,098
PMT0529	18,019,261	1,302,075	791,481												20,112,817
PMT1766		19,915,635													19,915,635
PMT1068		17,300,850	2,404,447	68,971											19,774,268
PMT0801		19,731,053	20												19,731,073
PMT2077	71,981	16,524,845	3,071,953												19,668,779
PMT0684		18,677,026	990,019												19,667,045
PMT1789		19,651,366													19,651,366
PMT1906	3,118,184	16,499,166													19,617,350
PMT1849		19,501,900	16,527												19,518,427
PMT0007		19,085,933	390,236												19,476,169
PMT1677		19,358,840	4,444												19,363,284
PMT1245		19,343,923	373												19,344,296
PMT2103		19,287,722	20,731												19,308,453
PMT1331		19,302,147													19,302,147
PMT0360	14,383,949	4,879,142	11,107												19,274,198
PMT1028		19,147,557	89,856												19,237,413
PMT1138		18,179,775	1,019,978												19,199,753

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2174		19,184,994	1,392												19,186,386
PMT2230		19,033,322	3,892												19,037,214
PMT1706	1,965,358	16,867,308	173,552	2,213	9,930										19,018,361
PMT2494		18,999,518													18,999,518
PMT1685		18,964,786	5,578												18,970,364
PMT1686	549,945	18,319,780													18,869,725
PMT1293	135,616	18,517,323	174,695												18,827,634
PMT0429		3,995,341	14,827,204												18,822,545
PMT1247		18,649,984	164,141												18,814,125
PMT0780		18,544,628	153,373												18,698,001
PMT1615		18,693,101	1,875												18,694,976
PMT0027		18,622,307													18,622,307
PMT0631		18,619,558													18,619,558
PMT1605		18,616,469													18,616,469
PMT2451		18,093,228	413,963												18,507,191
PMT3345	2,532	18,437,781	9,438												18,449,751
PMT1512		8,755,168	9,621,886	59,762											18,436,816
PMT3157		18,369,953	4,042												18,373,995
PMT0657	565,482	17,373,543	401,345												18,340,370
PMT1349		18,324,623													18,324,623
PMT0791	6,002,099	12,318,720	146												18,320,965
PMT0218		18,262,250													18,262,250
PMT0655		18,189,635	2,746												18,192,381
PMT1830	2,324,355	15,536,691	114,814	63,376	40,548										18,079,984
PMT3251		18,024,944													18,024,944
PMT0410	2,002,705	15,527,617	400,783	49											17,931,154
PMT1606		17,916,915	14,006												17,930,921
PMT2700		17,875,909	855												17,876,764
PMT3258	2,815	17,858,178	2,509												17,863,502
PMT0868		17,798,451	17,990	348											17,816,789
PMT2580	659,970	17,098,177	22,254	2,008											17,782,409
PMT1792	2,938	17,712,739													17,715,677
PMT0697		17,711,871	696												17,712,567
PMT3290		17,646,777	6,374		1,016	3,319	563								17,658,049
PMT1094	10,248	17,578,933													17,589,181
PMT1895		17,420,333			552	2,475									17,423,360
PMT2819		15,895,895	1,515,470	1,802											17,413,167
PMT2458	17,392,788														17,392,788
PMT2920		17,386,907													17,386,907
PMT2810	69	17,359,715	3,677	1,682											17,365,143
PMT2549		17,230,471	55,791	2,732											17,288,994
PMT1118		17,269,190	6,640												17,275,830
PMT1593		16,070,168	1,157,620												17,227,788
PMT1013		17,100,786	89,785												17,190,571
PMT1947	4,267,294	12,880,880	510												17,148,684
PMT3014		17,082,765		3,836	17,212										17,103,813
PMT1261	17,065,701	5,084													17,070,785
PMT0946	634	14,128,541	2,901,052	718											17,030,945
PMT3302	1,986,519	14,869,397	117,121	49,483											17,022,520
PMT0816		15,648,134	1,304,482												16,952,616
PMT3339		16,941,242													16,941,242
PMT0640		16,858,494	8,555												16,867,049
PMT1735		16,774,253	11,649	3,318	13,179	6,110	4,492	509	121						16,813,631
PMT2957		16,680,709	70,414												16,751,123
PMT1327	5,061,343	11,561,108	106,350	3,736	7,636										16,740,173
PMT1221		16,722,836	813	57	110										16,723,816
PMT1739		15,672,296	734,684	2,126											16,409,106
PMT1999		16,288,449	31,177												16,319,626
PMT2833		16,265,861													16,265,861

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2952		15,560,979	634,209												16,195,188
PMT0128		16,157,845	3,487												16,161,332
PMT0590		16,096,335													16,096,335
PMT2274		16,029,406	16,160												16,045,566
PMT2905		15,885,912	95,562												15,981,474
PMT0611	1,663	15,718,603	280,845												15,981,111
PMT2651		15,876,774	84,736												15,961,510
PMT2397		15,956,860	8												15,956,868
PMT1977		15,946,850	236												15,947,086
PMT1020		14,633,350	1,187,882												15,821,232
PMT2338		15,553,751	253,986												15,807,737
PMT1577		15,793,230													15,793,230
PMT1960		14,664,225	1,004,919	69,853											15,738,997
PMT1352		15,623,508	82,237	71	338	19									15,706,173
PMT0513	28,855	15,270,154	398,264												15,697,273
PMT1311		15,678,394	2,076		3,504	1,696									15,685,670
PMT0471		15,268,739	414,100												15,682,839
PMT2980	15,016,074	636,956	5,370												15,658,400
PMT2025		15,626,342													15,626,342
PMT3131	1,214	15,600,992	2,914												15,605,120
PMT0152	991	15,550,386	46,991												15,598,368
PMT0966		14,581,288	893,260	81,867	1,183										15,557,598
PMT2687	5,484	15,531,559													15,537,043
PMT2263		15,472,673	33,500												15,506,173
PMT1422	1,892,351	13,556,090													15,448,441
PMT1231	7,149,673	8,298,130													15,447,803
PMT1660	5,224	15,423,426													15,428,650
PMT3238	19,123	15,403,479													15,422,602
PMT3060		15,393,660													15,393,660
PMT2941	22,262	15,292,811													15,315,073
PMT0104		15,066,617	232,543	7,958	3,776										15,310,894
PMT1601		15,301,280													15,301,280
PMT0510	5,980	15,224,259	2,477	11,095											15,243,811
PMT0358		10,842,049	4,110,101	216,687	329										15,169,166
PMT2840		15,141,438													15,141,438
PMT3173		15,139,341													15,139,341
PMT1847	22,720	15,107,825													15,130,545
PMT1196		15,110,923	7,846	5,978											15,124,747
PMT0266		15,097,563	568												15,098,131
PMT1567		12,906,845	2,106,263												15,013,108
PMT2637		15,008,105													15,008,105
PMT2204	1,526,682	13,069,375	154,053	224,360											14,974,470
PMT2440	1,355	14,948,109	14,974												14,964,438
PMT3003		14,856,303	35,041												14,891,344
PMT1324	13,168,531	1,706,342													14,874,873
PMT0779		14,852,650	2,440												14,855,090
PMT1200		14,839,030													14,839,030
PMT1203	3,985,451	10,820,228	14,984												14,820,663
PMT0100		14,810,889													14,810,889
PMT0995		14,675,157	31,259												14,706,416
PMT2600		14,703,016													14,703,016
PMT2615		14,688,101	190												14,688,291
PMT1518		14,683,337													14,683,337
PMT1103		9,634,867	5,034,282	212	29										14,669,390
PMT2114	571	14,662,760	1,024												14,664,355
PMT1167	6,437	13,824,495	820,293	139											14,651,364
PMT1537		14,489,958	71,579												14,561,537
PMT0976		14,339,533	186,758	822											14,527,113
PMT0328	97,451	14,393,491	412												14,491,354

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT1894	1,823,162	9,526,713	3,134,194												14,484,069
PMT0288	9,389,223	4,695,363	249,326												14,333,912
PMT0047		14,291,210	15,526												14,306,736
PMT1097		14,234,176													14,234,176
PMT1576	12,895,600	1,266,572	50,449	583											14,213,204
PMT2933		14,022,130	25,998	110,655											14,158,783
PMT3280	1,496,197	12,562,233													14,058,430
PMT3152		13,935,802	114,094												14,049,896
PMT0808		14,035,306													14,035,306
PMT3096	224,438	13,790,986													14,015,424
PMT2725		13,972,523	5,728												13,978,251
PMT2033		2,081,658	11,391,685	444,599											13,917,942
PMT2648	622	13,901,137	10,213	2,429											13,914,401
PMT0448		13,883,865	25,515												13,909,380
PMT3341		13,831,879													13,831,879
PMT1707		13,801,425	9,090												13,810,515
PMT1643		13,777,749	79												13,777,828
PMT2296	17,962	13,672,057	78,563	1,114											13,767,716
PMT0465		13,697,822	647												13,698,469
PMT3128		13,687,566													13,687,566
PMT1902		13,636,550													13,636,550
PMT2484	4,009	13,532,833	8,135												13,544,977
PMT1738		13,502,739	44												13,502,783
PMT1699		13,502,287													13,502,287
PMT2750		1,668,925	11,350,856	392,894	10,168										13,422,843
PMT3329	92,324	13,294,120	20,977	5,660											13,413,081
PMT2631		13,236,344	138,216	23,430											13,397,990
PMT3109		13,351,687	25,169	579											13,377,435
PMT1071	11,059,350	2,308,304													13,367,654
PMT1314		13,326,169	28,160												13,354,329
PMT0107		13,345,759	5,258												13,351,017
PMT2670		10,962,958	2,356,395												13,319,353
PMT1961		13,213,184	10,395	4,376	19,627										13,247,582
PMT3133		13,241,204	10												13,241,214
PMT0960		3,673,205	9,484,112	56,633											13,213,950
PMT0582		13,185,046	1,800												13,186,846
PMT0673		13,170,276													13,170,276
PMT2835		12,864,573	232,859												13,097,432
PMT1808		13,095,000													13,095,000
PMT3176		12,981,286	54,450												13,035,736
PMT0306		12,974,966													12,974,966
PMT2235		12,919,191													12,919,191
PMT0944	742,835	12,057,807	78,809	20,339											12,899,790
PMT0275	23,099	12,819,658	53,225	1,115	140										12,897,237
PMT3108	7,490,931	5,352,842	18,070												12,861,843
PMT2356		12,778,925	28,019												12,806,944
PMT1313	10,082,198	2,638,658	74,855												12,795,711
PMT2328		12,620,702	701												12,621,403
PMT1276	12,537,008														12,537,008
PMT1328	33,403	12,409,158	8,278	12,745	157	702									12,464,443
PMT1430	12,377,859	72,763													12,450,622
PMT1676	1,772	12,418,252													12,420,024
PMT1857		12,414,823	2,311												12,417,134
PMT3137		12,416,282													12,416,282
PMT1375		12,412,906													12,412,906
PMT3285	2,202,626	10,200,759	5,368	3,550											12,412,303
PMT2959		12,356,549													12,356,549
PMT0970		12,189,465	133,267												12,322,732
PMT2319	2,052	12,284,980	10,071												12,297,103

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT0364		12,224,288	29,331												12,253,619
PMT2634	282,896	11,671,140	260,441	9,840											12,224,317
PMT1773		11,343,033	825,788												12,168,821
PMT1972		12,167,421													12,167,421
PMT2727	699,199	11,465,831	1,305												12,166,335
PMT2130		12,118,835	23,378	829											12,143,042
PMT2719		12,128,303													12,128,303
PMT1968		12,103,427													12,103,427
PMT1569		12,052,481		8,194	36,746										12,097,421
PMT2464	8,082	12,082,973	1,577												12,092,632
PMT1077		12,039,562													12,039,562
PMT0127		12,032,052													12,032,052
PMT3118		11,462,160	18,091	100,075	449,095	82									12,029,503
PMT2396		11,988,781	2,113												11,990,894
PMT1262		11,938,427													11,938,427
PMT1664	3,506,759	8,418,907													11,925,666
PMT0898	11,920,997														11,920,997
PMT2813		11,918,579	1,587												11,920,166
PMT1780		11,919,519	389												11,919,908
PMT3095		11,891,189	9,787												11,900,976
PMT0153	64,490	11,586,790	237,579												11,888,859
PMT2726	216,307	11,170,297	486,156	3,222											11,875,982
PMT2089		11,814,534	19,305												11,833,839
PMT2890		11,807,949	175	728											11,808,852
PMT0900	104	11,808,001	625												11,808,730
PMT2663	55,201	11,738,046													11,793,247
PMT2899	275,374	11,458,779	40,810	1											11,774,964
PMT2912		11,747,305	231												11,747,536
PMT2932		11,742,866													11,742,866
PMT1403		11,740,801	23												11,740,824
PMT1868		11,301,876	412,625	18,863											11,733,364
PMT0039		11,718,407	938												11,719,345
PMT1900		11,621,424	93,426												11,714,850
PMT2459		11,605,772	67,129												11,672,901
PMT0550		11,664,136	101												11,664,237
PMT2163		11,382,782	267,255												11,650,037
PMT0846		11,588,411													11,588,411
PMT0423		11,156,381	353,992												11,510,373
PMT2241		11,500,990													11,500,990
PMT2164	802	11,484,199	12,342												11,497,343
PMT2255		10,341,783	1,118,226	10											11,460,019
PMT1389		11,436,349													11,436,349
PMT1927	4,285	11,409,204													11,413,489
PMT2823	6,179	11,395,155	2,892												11,404,226
PMT1501		11,391,488	116												11,391,604
PMT3211		7,849,416	3,508,332	1,487											11,359,235
PMT0436		10,334,315	1,009,759	906											11,344,980
PMT0747	171,015	11,122,752	2,980	9,909											11,306,656
PMT3336		9,309,022	1,992,308												11,301,330
PMT0402		11,262,963													11,262,963
PMT0819	232,814	10,773,151	254,140	274											11,260,379
PMT1379		11,198,013	2,455												11,200,468
PMT2368		11,179,234	216												11,179,450
PMT1360		11,160,624	6,032												11,166,656
PMT2014		10,565,848	541,876												11,107,724
PMT0165		10,716,077	386,059												11,102,136
PMT1543	1,346	11,036,901	9,272												11,047,519
PMT0464		11,002,301													11,002,301
PMT0667		10,913,515	32,918												10,946,433

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT0398		10,902,984													10,902,984
PMT2778	53,510	10,821,583	12,819												10,887,912
PMT1392	1,079,424	9,770,127													10,849,551
PMT2372		10,722,030	2,414		42,214	66,371	7,703	2,160							10,842,892
PMT0501		10,603,637	155,758												10,759,395
PMT1219		10,441,951	296,278												10,738,229
PMT3324		420,082	3,655,217	6,632,462											10,707,761
PMT0967		10,317,897	383,968												10,701,865
PMT1264		10,582,292	89,607	1,349	86										10,673,334
PMT0621	10,648,240	14,906													10,663,146
PMT1135		10,639,421	3,157	1,565											10,644,143
PMT0636		10,486,996	149,968												10,636,964
PMT3097		10,394,940	214,623												10,609,563
PMT2931		10,375,103	228,888												10,603,991
PMT1522	115,344	10,488,111													10,603,455
PMT2199		10,563,021													10,563,021
PMT0069		10,419,952	125,781	748											10,546,481
PMT1060		10,507,767	5,952												10,513,719
PMT2149		10,480,972	3,852												10,484,824
PMT1294	4,446,471	5,993,905													10,440,376
PMT0338		10,384,870	11,721	40,824											10,437,415
PMT0473		10,197,660	193,415												10,391,075
PMT2092		10,366,306													10,366,306
PMT3308		10,310,443													10,310,443
PMT1177		10,304,326													10,304,326
PMT1651	1,366	10,258,794													10,260,160
PMT1523		10,226,071	18,376	3,245											10,247,692
PMT1558		10,242,742	195												10,242,937
PMT1596		10,221,268													10,221,268
PMT0419		9,937,996	283,193												10,221,189
PMT1515		9,862,234	334,745	358											10,197,337
PMT2650	526,916	9,204,284	448,961												10,180,161
PMT2286		10,133,597													10,133,597
PMT1982		10,131,941													10,131,941
PMT3089		10,002,934	128,250												10,131,184
PMT0669		10,130,452													10,130,452
PMT0207	3,525	10,121,639													10,125,164
PMT0759	8,720	10,094,727													10,103,447
PMT3169	2	10,034,227													10,034,229
PMT0271	66,052	9,959,528													10,025,580
PMT2843		10,012,527													10,012,527
PMT0542		9,968,858	11,980	4,671			891								9,986,400
PMT0214	110,776	9,409,527	420,910	24,596											9,965,809
PMT1687		7,220,277	2,727,150	116											9,947,543
PMT2895	9,901,337	41,839													9,943,176
PMT1984		9,903,447	7,028												9,910,475
PMT0982	8,668,454	1,233,218													9,901,672
PMT0615		9,879,511	355												9,879,866
PMT3217	9,738,169	126,181													9,864,350
PMT1978	30,909	9,818,808	7,271												9,856,988
PMT1832		9,835,815													9,835,815
PMT2302		9,824,424	8,489												9,832,913
PMT0530		9,826,612													9,826,612
PMT0576		9,824,508													9,824,508
PMT2227		9,809,838													9,809,838
PMT2552		9,752,410	4,523	8,988											9,765,921
PMT2438	4,255,253	5,493,048	12,374												9,760,675
PMT0051		9,757,978													9,757,978
PMT1175	8,200,091	1,552,248													9,752,339

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2423		9,708,773													9,708,773
PMT1291	610	9,649,735	23,549												9,673,894
PMT2939	536	9,667,618	1,479												9,669,633
PMT2384		8,832,029	827,839	888											9,660,756
PMT1878		9,640,405													9,640,405
PMT0929	9,450,371	172,782													9,623,153
PMT2359		9,616,971													9,616,971
PMT1585		9,603,032	581												9,603,613
PMT2304		9,484,078	111,786												9,595,864
PMT2285	7,640,879	1,886,853	18,083												9,545,815
PMT2361		8,648,383	886,888	5,359	558										9,541,188
PMT2090		9,520,357	3,716												9,524,073
PMT2222		2,209,154	7,224,328	41,027											9,474,509
PMT1549	2,959,621	6,495,209	5,891												9,460,721
PMT1449		9,456,038													9,456,038
PMT0504	68,909	8,210,460	1,153,623												9,432,992
PMT2124	3,724	9,426,891	80												9,430,695
PMT1926		9,392,852													9,392,852
PMT0226		3,856,299	5,486,873	48,288											9,391,460
PMT2987		9,389,988													9,389,988
PMT0843	9,255,198	106,090													9,361,288
PMT1823	346,382	8,997,399	1,933												9,345,714
PMT2349		9,336,132													9,336,132
PMT2266	6,557,804	2,778,070													9,335,874
PMT3149		9,329,657													9,329,657
PMT3175		9,303,329													9,303,329
PMT0375		9,294,163													9,294,163
PMT3029		9,291,478	1,359												9,292,837
PMT3212		9,291,512													9,291,512
PMT2983		9,277,045	5,513				1,002	1,381							9,284,941
PMT2744		9,275,170	2,486												9,277,656
PMT1772		9,262,453	12,214												9,274,667
PMT0194		9,267,289													9,267,289
PMT1459	2,000	9,232,870	2,157	1,507											9,238,534
PMT0804		9,236,030													9,236,030
PMT1655	70,200	9,124,223	31,151												9,225,574
PMT2218		9,165,519	45,002												9,210,521
PMT1006		8,847,084	348,839												9,195,923
PMT2200		9,186,334													9,186,334
PMT2186		9,062,287	120,458												9,182,745
PMT1809		9,165,298	1,517												9,166,815
PMT2045		9,134,120	11,700												9,145,820
PMT3188		8,631,804	502,462												9,134,266
PMT0755		9,124,972	4,639												9,129,611
PMT0757	3,036	9,067,561	18,953												9,089,550
PMT0321		9,033,568	53,613												9,087,181
PMT2470	7,411,867	1,614,532													9,026,399
PMT2276		8,676,559	324,869												9,001,428
PMT1037		8,895,452	95,799												8,991,251
PMT3114		8,960,565	290												8,960,855
PMT3063	8,954,691														8,954,691
PMT1618	92,909	7,766,779	1,001,833	79,453											8,940,974
PMT1967		8,316,938	622,713												8,939,651
PMT0123	8,825,876	97,852													8,923,728
PMT2565		8,906,187													8,906,187
PMT3259		8,902,295													8,902,295
PMT2676		8,838,183	46,974												8,885,157
PMT2387		8,841,964													8,841,964
PMT1952	547,670	8,274,078	4,988												8,826,736

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PMT1662	2,079,246	4,127,306	2,608,880												8,815,432
PMT3132	163,313	8,626,606	12,854												8,802,773
PMT1093		8,800,016													8,800,016
PMT0261		8,757,439	9,322												8,766,761
PMT0095		8,753,596	1,391												8,754,987
PMT1412		8,725,591	16,776												8,742,367
PMT0973		6,984,033	1,754,383												8,738,416
PMT0284	4,892,805	3,838,047													8,730,852
PMT2786	357,346	8,138,854	229,378												8,725,578
PMT2900		8,692,589	30,773												8,723,362
PMT1934	761,427	7,749,791	206,058												8,717,276
PMT1632		8,700,596													8,700,596
PMT0372	249,524	8,436,406	293	1,311											8,687,534
PMT1914		8,607,593	59,289	6	12										8,668,900
PMT0554		8,298,150	367,433												8,665,583
PMT1159	374,211	8,284,043													8,658,254
PMT0822		8,136,471	478,083												8,614,554
PMT2454		8,512,588	98												8,512,686
PMT0483		8,496,937	3,764												8,500,701
PMT1023		8,007,165	473,345	29											8,480,539
PMT1616	38,756	8,362,416	14,175	60,040											8,475,387
PMT0934	279,530	8,189,609													8,469,139
PMT1086		8,132,005	226,570												8,358,575
PMT2232		8,212,445	145,463												8,357,908
PMT2481		6,631,001	1,720,762	743											8,352,506
PMT1040		8,319,276	8,210												8,327,486
PMT1923		7,884,074	422,337												8,306,411
PMT1158		6,804,262	1,133,924	367,994											8,306,180
PMT1190		8,288,517													8,288,517
PMT0658		8,255,089													8,255,089
PMT1155	7,147,238	1,099,107	4,878			92	409								8,251,724
PMT2802		8,178,960	1,745												8,180,705
PMT0102		7,943,532	219,563												8,163,095
PMT2821		8,161,788													8,161,788
PMT1477		8,129,428	2,315												8,131,743
PMT3027	8,128,106														8,128,106
PMT1157		7,351,002	730,972												8,081,974
PMT2826		8,069,619													8,069,619
PMT0089		8,062,702													8,062,702
PMT2170		6,757,534	1,302,667												8,060,201
PMT3052		8,040,523													8,040,523
PMT1199		7,982,368	22,782	19,390											8,024,540
PMT3021	133,570	7,878,049	10,400												8,022,019
PMT2062	8,014,999	1,321													8,016,320
PMT1649		8,010,043	788												8,010,831
PMT2822		8,004,828	820	689											8,006,337
PMT2515	7,645,803	344,416	1,106	2,175											7,993,500
PMT3223		7,982,597													7,982,597
PMT2693		7,917,214	50,133												7,967,347
PMT1101	200,011	7,744,992													7,945,003
PMT1031		7,875,168	63,786	846	1,224										7,941,024
PMT1639		7,938,917	146												7,939,063
PMT0913	20,856	7,854,639	30,863												7,906,358
PMT1841		7,898,478													7,898,478
PMT0487	7,898,320														7,898,320
PMT2450		7,862,558	2,812	4,035	17,106										7,886,511
PMT2301	2,171,937	5,583,678	123,496												7,879,111
PMT1995		7,844,446	10,122	17,093											7,871,661
PMT3125		7,865,767													7,865,767

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT2181	3,165,520	4,498,170	187,015												7,850,705
PMT1323	5,544,970	2,296,104													7,841,074
PMT2919		7,835,972													7,835,972
PMT1250	133,438	7,093,990	591,694	5,094	1,287										7,825,503
PMT1126		7,503,320	319,794												7,823,114
PMT0792		7,819,843													7,819,843
PMT3045	3,698,544	4,074,392	44,555												7,817,491
PMT0342		7,801,372	328												7,801,700
PMT1088	208,992	6,965,457	616,710	3,310											7,792,469
PMT0802	1,532,729	6,167,424	38,366	42,119	10,934										7,791,572
PMT2492		7,182,455	550,146	10,368	997	1,152	874	852							7,746,844
PMT3265	28,791	7,706,253													7,735,044
PMT3282	719,122	6,970,025	40,350												7,729,497
PMT1851		7,720,526													7,720,526
PMT3016	3,324	7,385,787	326,244	3,600											7,718,955
PMT1374		7,684,112	13,480												7,697,592
PMT0142	3,902,424	3,790,389	4,469												7,697,282
PMT0015		7,615,331	58,682												7,674,013
PMT2740		7,631,618	36,921	7											7,668,546
PMT1678	1,452,681	6,178,708													7,631,389
PMT3028		7,582,375	21,062												7,603,437
PMT2344	1,780,536	5,688,838	91,877												7,561,251
PMT3013		7,504,702	44,367												7,549,069
PMT0997		7,519,814	1,852												7,521,666
PMT2798	6,464	7,506,441													7,512,905
PMT0312		7,502,216													7,502,216
PMT0559		7,501,365													7,501,365
PMT0878		7,480,060	9,902												7,489,962
PMT2587	379,963	7,105,105													7,485,068
PMT1010	6,263,616	1,183,512	14,924												7,462,052
PMT1029	500	7,437,479	16,520												7,454,499
PMT3116	933	7,000,863	442,677												7,444,473
PMT1533	2,007,759	5,423,192	13,284												7,444,235
PMT0339		7,382,985	15,109	608											7,398,702
PMT1378		7,351,610	31,442												7,383,052
PMT2880		7,240,540	127,140												7,367,680
PMT1371		7,365,771													7,365,771
PMT2288		7,127,653	237,766	8											7,365,427
PMT2433		7,261,157	36,624												7,297,781
PMT0382	116,356	6,875,967	300,749	8	33										7,293,113
PMT2219		6,563,007	723,858	812											7,287,677
PMT0859	5,708,315	1,576,638													7,284,953
PMT2126		7,232,280	36,004												7,268,284
PMT2688		6,863,683	389,750												7,253,433
PMT0136		7,246,431													7,246,431
PMT1675	7,066,005	156,792	597												7,223,394
PMT1161	1,061,578	6,006,820	138,153												7,206,551
PMT1333		6,489,274	684,030												7,173,304
PMT2776	152,469	6,975,686	33,879	2,406											7,164,440
PMT1652	7,163,440														7,163,440
PMT0833	6,616,122	546,259													7,162,381
PMT0374	49,134	6,860,825	131,477	119,411											7,160,847
PMT1784	1,735	7,152,160	382												7,154,277
PMT0846		7,149,605													7,149,605
PMT2244	5,387,113	1,726,883	16,121												7,130,117
PMT3155		7,108,749	15,319												7,124,068
PMT0120		1,466,431	5,653,960												7,120,391
PMT0609	55,062	6,979,330	29,883												7,064,275
PMT2504		7,062,209													7,062,209

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT0270	3,475	7,033,638	2,606												7,039,719
PMT0182	7,036,749														7,036,749
PMT2220		7,017,683	15,875												7,033,558
PMT3032		7,025,950	2,024												7,027,974
PMT3343		7,026,329	230												7,026,559
PMT2159		6,945,466	78,947	622											7,025,035
PMT1172		7,021,230													7,021,230
PMT2679		6,835,511	181,195												7,016,706
PMT2491		7,008,253	1,521												7,009,774
PMT2392		6,974,192	30,041												7,004,233
PMT3172		6,995,824													6,995,824
PMT2626		6,990,972													6,990,972
PMT1053		6,961,989	1,272												6,963,261
PMT1711	18,919	6,907,004	13,240	2,578	8,485										6,950,226
PMT3126		6,450,388		86,111	384,988										6,921,487
PMT1717	5,272,641	1,611,118	35,853												6,919,612
PMT3147		6,914,211													6,914,211
PMT1082	955,718	5,901,719	44,744												6,902,181
PMT0166		6,865,123	36,538												6,901,661
PMT1505	6,859,614														6,859,614
PMT2543	6,849,251	1,476													6,850,727
PMT1727		6,837,625	3,281												6,840,906
PMT0495	4,840,613	1,996,465													6,837,078
PMT0050	793,874	4,480,008	1,526,258												6,800,140
PMT0858			2,345,346	4,432,855											6,778,201
PMT2961	3,325,325	3,121,303	281,010	28,977											6,756,615
PMT1617		6,756,343													6,756,343
PMT3318		6,271,862	466,636												6,738,498
PMT2234		6,715,418	2,028	9,090											6,726,536
PMT2618	6,679,298	44,324													6,723,622
PMT0814		6,712,567													6,712,567
PMT2188	2,087	6,484,598	117,047	105,459											6,709,191
PMT2473	5,722,482	981,043													6,703,525
PMT2781		6,661,111	11,354												6,672,465
PMT1876		6,580,287	82,196												6,662,483
PMT1213		6,535,177	111,932	5,964											6,653,073
PMT0567		6,610,731													6,610,731
PMT2445	79,528	6,524,778	1,026												6,605,332
PMT2478		6,555,132	29,508												6,584,640
PMT0828	105,993	6,461,355	13,187	14	225	435									6,581,209
PMT1715		6,578,808													6,578,808
PMT3306	17,300	6,545,230	14,170	927											6,577,627
PMT0748		6,551,663	6,473												6,558,136
PMT0938		6,556,773													6,556,773
PMT1721		5,117,111	1,397,498												6,514,609
PMT2814		6,509,609													6,509,609
PMT2594		6,498,591	2,828												6,501,419
PMT0706	6,270,222	217,504	5,679												6,493,405
PMT1589		6,491,705													6,491,705
PMT2925		6,490,258													6,490,258
PMT0784	874,732	5,531,019	67,305	10,624											6,483,680
PMT2603		5,727,440	718,100	26,080											6,471,620
PMT2000	867,804	5,525,225	67,395												6,460,424
PMT2863	3,465,153	2,836,220	140,970	2,550											6,444,893
PMT0971	18,282	6,271,165	150,057	1,252											6,440,756
PMT3081	1,461,134	4,964,349	8,380												6,433,863
PMT0964		6,402,590	7,606												6,410,196
PMT0355		6,391,373	6,482	11,517											6,409,372
PMT2439	4,872	6,398,683	1,255												6,404,810

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PMT0536		6,402,580													6,402,580
PMT0880	6,228,107	168,966													6,397,073
PMT3037	9,491	6,311,209	75,717												6,396,417
PMT2390	7,341	6,157,118	218,052												6,382,511
PMT2269		5,921,068	454,672												6,375,740
PMT0486	2,740,155	3,630,348													6,370,503
PMT2891		6,320,443	46,951												6,367,394
PMT2081		6,346,907	3,769												6,350,676
PMT3138		6,207,261	129,584												6,336,845
PMT1541		6,307,985	5,775												6,313,760
PMT2923	2,445,189	3,848,979													6,294,168
PMT2502	6,294,075														6,294,075
PMT0415		6,266,500													6,266,500
PMT2436	225,106	5,519,899	495,123	20,646											6,260,774
PMT2057		6,245,516	4,323												6,249,839
PMT2386		6,243,287	66												6,243,353
PMT1166	1,241,269	4,933,258	16,583												6,193,110
PMT1720	2,144	6,182,146	1,190												6,185,480
PMT2595	4,118	6,168,017													6,172,135
PMT0349		6,100,729	69,961												6,170,690
PMT2723		6,170,380													6,170,380
PMT0324	7,224	6,160,850													6,168,074
PMT0160		6,165,059	1,023												6,166,082
PMT3121	7,358	6,151,145													6,158,503
PMT3040		6,138,778	3,937												6,142,715
PMT1125		6,100,031													6,100,031
PMT0191		4,650,319	1,445,323												6,095,642
PMT2294		6,091,897	1,296												6,093,193
PMT3317	950,653	4,878,625	254,687	1,696		387	1,735								6,087,783
PMT2290		6,058,696	22,978												6,081,674
PMT0247	6,076,152														6,076,152
PMT2239		6,074,771													6,074,771
PMT3214		6,043,722	17,658												6,061,380
PMT3203		6,051,729													6,051,729
PMT1886		5,766,583	149,078	95,387	20,877	14,193	1,608	963	829						6,049,518
PMT0221		6,048,781													6,048,781
PMT2737	26,025	6,019,004	737												6,045,766
PMT2770	24,987	5,686,187	296,590												6,007,764
PMT2566	8,545	5,992,081													6,000,626
PMT1692	27,226	5,914,161	37,581												5,978,968
PMT2965	33,750	5,938,102	1,098		846										5,973,796
PMT0597		5,970,224													5,970,224
PMT1417	2,547	5,901,642	64,847												5,969,036
PMT2102	1,598,429	4,366,045													5,964,474
PMT1955		5,962,713													5,962,713
PMT0333	540,068	5,072,411	345,389												5,957,868
PMT1122	476,598	5,475,543													5,952,141
PMT1019		5,946,677													5,946,677
PMT1815	233,844	5,641,631	54,112												5,929,587
PMT1164		5,925,027	3,162												5,928,189
PMT2026		5,919,464													5,919,464
PMT1560		5,837,268	59,388												5,896,656
PMT3068		5,886,684													5,886,684
PMT1547		5,880,780													5,880,780
PMT0046		5,835,819	39,967												5,875,786
PMT1743		5,871,721													5,871,721
PMT3074	1,403,192	4,173,708	277,894	8,347	272	1,217									5,864,630
PMT2132	20,896	5,813,426	24,347												5,858,669
PMT2686	1,829,809	3,070,964	948,638	1,121											5,850,532

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PMT3067		5,846,137													5,846,137
PMT1956	2,975,315	2,858,490	2,101												5,835,906
PMT2194	3,333	5,779,641	51,539												5,834,513
PMT2682		5,826,957	39												5,826,996
PMT0388	2,121,320	3,569,466	111,661	1,427											5,803,874
PMT0523	3,914,703	1,868,598													5,783,301
PMT2874		5,775,066													5,775,066
PMT1434		5,767,950	1,780												5,769,730
PMT0414		5,611,162	143,163												5,754,325
PMT0283		5,749,721													5,749,721
PMT0356		5,749,718													5,749,718
PMT0444		5,738,669	4												5,738,673
PMT2042		5,738,137	530												5,738,667
PMT2140		5,738,660													5,738,660
PMT2201		5,098,395	639,824												5,738,219
PMT2774	426,137	4,312,061	988,561	3,044											5,729,803
PMT2712	2,325	5,585,140	128,786												5,716,251
PMT0990		5,713,098													5,713,098
PMT2063		3,507,582	2,116,940	68,994											5,693,516
PMT2060		5,692,159	57												5,692,216
PMT3311		5,610,106	36,255												5,646,361
PMT1496		5,620,579	3,313												5,623,892
PMT0683		5,017,125	605,159												5,622,284
PMT1574	5,591,983														5,591,983
PMT0146		5,590,725													5,590,725
PMT1369	10,657	5,568,753	3,999												5,583,409
PMT2072		5,581,030													5,581,030
PMT2803		5,580,842													5,580,842
PMT3269		5,580,139													5,580,139
PMT1682	33,711	5,426,928	106,547												5,567,186
PMT0969	28,381	5,517,732	18,394												5,564,507
PMT0311		4,743,270	813,563												5,556,833
PMT2897	4,246,465	1,274,920	31,840												5,553,225
PMT1462	1,005,447	4,524,438	1,386												5,531,271
PMT0596		5,475,008	36,207	10,944	8,635										5,530,794
PMT1021	5,489,877														5,489,877
PMT0555	1,770,445	3,715,101													5,485,546
PMT1648		4,748,835	736,067												5,484,902
PMT1431	906,256	4,363,540	208,366												5,478,162
PMT1061		5,388,443	64,669	1,767											5,454,879
PMT2379	2,155,205	3,286,819													5,442,024
PMT2113		4,649,271	786,723	450											5,436,444
PMT2975		5,407,486	16,598	1,416											5,425,500
PMT3281		5,095,341	325,361	683	322										5,421,707
PMT0725	68,550	2,561,462	1,774,178	595,277	323,725	6,136	10,918	38,823		36,261	4,002				5,419,332
PMT0045		27,289	1,910,268	3,472,160											5,409,717
PMT2086		5,406,490													5,406,490
PMT1326	4,778,364	610,084	8,142												5,396,590
PMT3283		5,392,393	3,141												5,395,534
PMT2542		5,373,027													5,373,027
PMT1568	463,370	4,832,329	59,358												5,355,057
PMT2620		5,345,819	115												5,345,934
PMT0408		5,339,528	605												5,340,133
PMT3020		5,322,616													5,322,616
PMT1361		5,321,288													5,321,288
PMT0560		5,115,367	203,645	550											5,319,562
PMT0591		5,304,687													5,304,687
PMT0453	913,110	3,980,491	379,523	7,139	23,357										5,303,620
PMT1637	5,253,832														5,253,832

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PMT1080	1,270,614	3,946,812	30,065												5,247,491
PMT1152		5,206,433	36,270	2,401											5,245,104
PMT2527		5,236,222													5,236,222
PMT0264	1 130,639	4,002,082	96,776												5,229,497
PMT1211		5,189,834	39,127	23											5,228,984
PMT2173		5,222,695													5,222,695
PMT3314		5,217,311	1,701	686											5,219,698
PMT0645		5,212,955													5,212,955
PMT2510		5,212,789													5,212,789
PMT1189	61,203	4,315,764	835,813												5,212,780
PMT0254		5,204,885	3,451												5,208,336
PMT3312		5,204,923													5,204,923
PMT0031		5,035,126	124,743	34,900	8,097	663									5,203,531
PMT1777		5,192,869	7,375												5,200,244
PMT0632	136,265	5,051,987	8,500												5,196,752
PMT0023	158,409	4,952,697	77,350	1,112											5,189,568
PMT3019	4,839,013	347,004													5,186,017
PMT1483		5,180,568	4,440												5,185,008
PMT0876		5,184,391	216												5,184,607
PMT2066	39,926	5,049,526	91,687												5,181,139
PMT2761	215,428	4,913,000	36,820	3,780											5,169,028
PMT0286	112,923	4,861,936	190,713												5,165,572
PMT2434		5,164,128	1,266												5,165,394
PMT2990		1,963,293	580,335	2,604,368											5,147,996
PMT1463	1	5,141,355													5,141,356
PMT2137		5,134,189	61												5,134,250
PMT0019	8,790	5,095,033	13,371												5,117,194
PMT0135		4,180,127	928,642												5,108,769
PMT1290	6,868	5,097,261	895												5,105,024
PMT1206		5,074,884	22,834												5,097,718
PMT2677		5,095,404													5,095,404
PMT1036		4,368,879	724,489												5,093,368
PMT2729		5,090,120													5,090,120
PMT0677	316,810	4,761,838	245												5,078,893
PMT1091		5,074,849	933	109	823										5,076,714
PMT0203		4,331,550	732,425												5,063,975
PMT1736	1,562,230	3,461,799	39,067												5,063,096
PMT2556		5,054,008	72												5,054,080
PMT2722		5,047,919													5,047,919
PMT0605	2,875,947	1,717,015	446,227												5,039,189
PMT1708		5,038,516													5,038,516
PMT0705		4,988,059	49,798												5,037,857
PMT1142	4,543,505	484,620													5,028,125
PMT1650		5,007,670													5,007,670
PMT2398		5,000,999													5,000,999
PMT0434		4,997,486													4,997,486
PMT2254		4,989,152													4,989,152
PMT2642	376,238	4,128,096	211,073	263,625											4,979,032
PMT0741	4,861,793	108,965													4,970,758
PMT0985		4,949,301	253												4,949,554
PMT1494	2,753	4,938,902	704												4,942,359
PMT1256		3,065,873	1,739,014	131,110											4,935,997
PMT1754		4,930,234	2,335												4,932,569
PMT2324		4,609,406	317,939		715	3,199									4,931,259
PMT2330	2,095,947	2,833,980													4,929,927
PMT1073	3,914,060	1,011,138		574	2,570										4,928,342
PMT3253	3,947	4,861,228	52,826												4,918,001
PMT0036		4,917,884													4,917,884
PMT1917	4,913,835														4,913,835

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT0459		4,907,605													4,907,605
PMT1112	217,862	4,689,890	2,236												4,889,988
PMT0614		4,881,966	4,470												4,886,436
PMT1355	3,975,845	910,193													4,886,038
PMT1811		4,871,611	5,741												4,877,352
PMT3006	3,895	4,869,266													4,873,161
PMT0989	1,375,731	3,412,416	80,941	1,634											4,870,722
PMT0879		4,863,272													4,863,272
PMT3224		4,840,300	3,579	13,819											4,857,698
PMT0551		4,855,182													4,855,182
PMT1495		4,843,281													4,843,281
PMT0568		4,837,931													4,837,931
PMT0729		4,836,311													4,836,311
PMT0592		4,826,674	2,274												4,828,948
PMT2167	4,825,644														4,825,644
PMT2792		4,818,298													4,818,298
PMT2215		4,568,421	244,177												4,812,598
PMT2669		4,811,011													4,811,011
PMT0178	50,967	4,738,110	17,921												4,806,998
PMT2147		4,678,573	127,351												4,805,924
PMT0815		4,805,320													4,805,320
PMT1659	4,129	4,766,571	33,223								1,198				4,805,121
PMT3009		4,427,201	375,607												4,802,808
PMT1480	2,111,603	2,670,838	19,037												4,801,478
PMT2118	3,942,159	851,502	5,984												4,799,645
PMT3185	2,736,365	2,052,707	5,322												4,794,394
PMT0274		4,791,134	1,216												4,792,350
PMT2463		3,922,377	866,329	78											4,788,784
PMT2859		4,678,495	107,061												4,785,556
PMT0206		4,758,622	24,418												4,783,040
PMT1270		4,765,612													4,765,612
PMT0908	297,023	4,400,903	58,523		432	1,937									4,758,818
PMT1898	1,900,549	2,854,543													4,755,092
PMT0881		4,749,222													4,749,222
PMT0077		4,110,908	628,814	1,329											4,741,051
PMT0348	494,131	3,995,197	154,329	90,267											4,733,924
PMT1819		1,594,601	3,134,235												4,728,836
PMT1873	30,222	4,683,805	11,440												4,725,467
PMT2050	4,063,087	309,685	351,021												4,723,793
PMT1933		4,701,626													4,701,626
PMT0010		3,171,921	1,468,259	51,756											4,691,936
PMT0428	183,677	4,499,347	2,541												4,685,565
PMT0491	2,542,979	2,141,071													4,684,050
PMT2317	73,852	4,585,590	21,760	406	1,816										4,683,424
PMT2120	4,682,681														4,682,681
PMT3055		4,680,140													4,680,140
PMT2176		4,581,630	96,339												4,677,969
PMT0974		4,677,106													4,677,106
PMT0462		4,655,835													4,655,835
PMT2183	2,930,772	1,545,537	115,153	44,350											4,635,812
PMT2794		3,670,313	950,382	8,048											4,628,743
PMT0606		2,704,126	1,223,820	608,979	90,915										4,627,840
PMT3242		4,577,038	43,801												4,620,839
PMT0561	2,953,995	1,611,748	35,674	18,476											4,619,893
PMT3158		4,611,106													4,611,106
PMT2068		4,609,363													4,609,363
PMT1473	145,748	4,372,822	52,581	10,738				4,563							4,586,452
PMT0826	4,552,397	26,009													4,578,406
PMT2389		4,449,811	119,179												4,568,990

Permit Number	Cards	Letters												Total
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PMT0209	19,484	4,303,622	237,058												4,560,164
PMT3156		4,556,167													4,556,167
PMT1966	5,023	4,540,323	4,487												4,549,833
PMT3322		4,523,113	22,793												4,545,906
PMT2858	578,717	3,839,743	125,527												4,543,987
PMT2322		4,543,347													4,543,347
PMT1588	1,822	4,540,171													4,541,993
PMT2369		4,042,493	496,276	591											4,539,360
PMT3065		4,535,288													4,535,288
PMT0121		3,536,971	981,735	15,485											4,534,191
PMT0839	4,283,841	247,718	224												4,531,783
PMT0778	3,244,099	1,256,439	22,515												4,523,053
PMT1810		4,521,527	8												4,521,535
PMT0942	4,348,681	162,489	3,772	438											4,515,380
PMT0775	1,570,357	2,938,990													4,509,347
PMT1387	4,112,071	377,166	19,848												4,509,085
PMT3215		4,501,232													4,501,232
PMT2024		4,500,728													4,500,728
PMT2522		4,495,678													4,495,678
PMT1658	235,197	4,239,476	14,755												4,489,428
PMT1742		3,633,633	843,248												4,476,881
PMT1844		4,470,268													4,470,268
PMT0648	4,466,795														4,466,795
PMT2954		4,464,339	2,444												4,466,783
PMT0409	808	4,465,150													4,465,958
PMT3183	465,745	3,817,636	180,495												4,463,876
PMT2151		4,462,778													4,462,778
PMT2546		4,020,773	439,204	460											4,460,437
PMT2852	904,175	2,126,029	1,427,156												4,457,360
PMT1234	21,586	4,431,556													4,453,142
PMT1348		2,663,780	1,572,194	216,964											4,452,938
PMT2993	729,625	3,678,798	28,169	5,770	7,568										4,449,930
PMT1971		4,448,711													4,448,711
PMT1136		3,634,490	684,168	121,867											4,440,525
PMT3286	22,366	4,392,877	14,506												4,429,749
PMT2799		4,421,644													4,421,644
PMT3198		4,416,650	690												4,417,340
PMT2485		4,415,881													4,415,881
PMT3141	1,226,884	3,065,739	118,557	1,178	539										4,412,897
PMT2278		4,228,342	182,450												4,410,792
PMT1740	589	4,279,743	130,098												4,410,430
PMT1075	62,486	4,305,915	37,192												4,405,593
PMT0353		4,396,849													4,396,849
PMT0711		4,394,351													4,394,351
PMT2315	1,823,691	2,569,748													4,393,439
PMT0824	4,123,531	269,701													4,393,232
PMT2371		4,392,945													4,392,945
PMT0603	4,391,481														4,391,481
PMT2569		4,391,130													4,391,130
PMT0535	1,587,123	2,607,790	190,125	4,058											4,389,096
PMT0726		4,379,039	1,522												4,380,561
PMT1342		4,220,017	158,217												4,378,234
PMT2512		4,377,902													4,377,902
PMT1848		4,376,258													4,376,258
PMT0907	4,374,525														4,374,525
PMT3077	5,924	4,346,939	5,982												4,358,845
PMT1787		4,350,548	5,353												4,355,901
PMT2698		4,314,016	40,430	994											4,355,440
PMT0211		4,348,840													4,348,840

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PMT0315	213,986	3,859,245	102,464	166,021											4,341,716
PMT3075		4,107,905	232,816												4,340,721
PMT2008		4,334,473													4,334,473
PMT1033	372,746	3,908,892	44,530	5,401											4,331,569
PMT3187		4,330,275	1,047												4,331,322
PMT0924	4,312,093	15,227													4,327,320
PMT0352	858,476	3,467,111													4,325,587
PMT1325		4,322,467													4,322,467
PMT3332	2,257,080	2,016,966	40,006	3,525											4,317,577
PMT2998		4,314,410													4,314,410
PMT3319	1,919,124	2,389,297	3,765												4,312,186
PMT0915		4,304,697													4,304,697
PMT1274		4,288,413													4,288,413
PMT2250	4,245,281	35,631													4,280,912
PMT0825	1,151,680	3,104,646													4,256,326
PMT2915		4,245,796		169	1,508	3,501									4,250,974
PMT1552	4,199,018	31,664	4,391												4,235,073
PMT0704		4,228,957	231												4,229,188
PMT2351		4,219,398													4,219,398
PMT0300	658,671	3,559,261	7												4,217,939
PMT0764		4,189,813	24,826												4,214,639
PMT1365		4,214,469													4,214,469
PMT1563	1,848,734	2,363,137													4,211,871
PMT1303		4,211,022													4,211,022
PMT1249		4,211,011													4,211,011
PMT0901		4,191,060													4,191,060
PMT2850		4,188,629													4,188,629
PMT1395	5,000	4,177,649	358												4,183,007
PMT0763	70,196	4,110,470	67												4,180,733
PMT2907		4,174,492	2,390	426											4,177,308
PMT2714		4,173,071													4,173,071
PMT0367		4,156,061	11,039												4,167,100
PMT3058		3,377,525	707,588	34,564	31,179	8,047				4,978	902				4,164,783
PMT0454		4,151,407	11,064												4,162,471
PMT1224	4,024	4,155,446													4,159,470
PMT1758		510,899	3,266,815	371,082											4,148,796
PMT2892	61,268	4,060,029	20,022		4,077										4,145,396
PMT1796		4,143,076													4,143,076
PMT1888	26,109	4,111,172	2,040	599	1,082										4,141,002
PMT2051		4,135,841													4,135,841
PMT2838	22,965	3,491,306	609,281												4,123,552
PMT0537	4,120,987														4,120,987
PMT1726		3,994,296	115,820	6,464											4,116,580
PMT0369	125	4,115,190													4,115,315
PMT0431	57,003	4,047,192	2,866												4,107,061
PMT0196		2,955,645	1,094,270	53,706											4,103,621
PMT1381	1,099,919	3,000,625													4,100,544
PMT1636	1,615,491	2,483,896													4,099,387
PMT2591		4,004,463	94,138												4,098,601
PMT0224		4,088,420	166	547	614										4,089,747
PMT1835	1,773,050	2,316,252													4,089,302
PMT2715		4,075,074													4,075,074
PMT1435		4,073,704													4,073,704
PMT2217		4,054,212													4,054,212
PMT2973		4,053,776													4,053,776
PMT0110		4,052,177													4,052,177
PMT0394	55,424	3,945,621	45,471												4,046,516
PMT1300		4,043,064													4,043,064
PMT2466		4,042,498			97	434									4,043,029

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PMT0392		3,980,493	56,002												4,036,495
PMT1969		4,032,084													4,032,084
PMT2787	2,666,853	1,362,600	2,502												4,031,955
PMT1869		4,031,085													4,031,085
PMT1283	1,100,351	2,925,836													4,026,187
PMT1504		4,019,553													4,019,553
PMT0307		1,665,827	1,867,257	484,289											4,017,373
PMT0071	885,478	3,208,001	121,723												4,015,202
PMT3226	169,791	3,843,313													4,013,104
PMT2841		3,968,771	40,000												4,008,771
PMT0417	2,925,861	1,079,155	2,060												4,007,076
PMT0625		3,831,533	173,948	468											4,005,949
PMT2046		4,002,652	438												4,003,090
PMT2088	922,220	3,010,587	69,476												4,002,283
PMT1366	1,123,828	2,865,873													3,989,701
PMT0305		3,981,888	112												3,982,000
PMT1647	788,949	3,101,869	87,258												3,978,076
PMT1455	508,699	3,461,185	4,517					437	1,961						3,976,799
PMT1520	3,196,788	773,836	2,427												3,973,051
PMT0101		3,789,919	163,393	5,188	12,038	511									3,971,049
PMT1764	3,962,804	1,814													3,964,618
PMT1129	3,958,720														3,958,720
PMT0777		3,957,773													3,957,773
PMT0961	81,621	3,863,445													3,945,066
PMT1970	13,531	3,927,945													3,941,476
PMT0691		3,931,264	1,799	8,055											3,941,118
PMT1798		3,936,842													3,936,842
PMT1824	10,511	3,788,641	123,466												3,922,618
PMT0204		3,921,406													3,921,406
PMT2168	686,065	3,233,790													3,919,855
PMT2229	149,082	3,700,302	69,340	638											3,919,362
PMT2374		2,243,469	1,675,460												3,918,929
PMT2443		3,857,906	12,000												3,869,906
PMT0397		3,867,905													3,867,905
PMT1004		3,860,821													3,860,821
PMT2117		3,853,385													3,853,385
PMT1198	2,817,505	1,034,026													3,851,531
PMT3206		3,844,352													3,844,352
PMT2982		3,825,677	17,928												3,843,605
PMT3181	3,838,364														3,838,364
PMT2109	1,077,725	2,710,173	47,887	1,226											3,837,011
PMT1227		3,831,726	1,498												3,833,224
PMT2091	1,720,236	2,111,373													3,831,609
PMT1390	9,897	3,816,935													3,826,832
PMT2074	3,521,688	301,335													3,823,023
PMT1268	215,353	3,338,273	265,535	2,737											3,821,898
PMT1398	117,521	3,635,365	62,521												3,815,407
PMT2784		3,652,566	153,349												3,805,915
PMT2691		3,805,888													3,805,888
PMT2926			3,804,220												3,804,220
PMT1989	2,006,697	1,786,608	10,495												3,803,800
PMT1734	213,602	3,583,537	2,106												3,799,245
PMT2154	5,011	3,494,396	269,571	26,212	1,918										3,797,108
PMT0865		3,796,046													3,796,046
PMT1911		3,766,149	27,673												3,793,822
PMT3038		3,793,569													3,793,569
PMT1948		3,788,964	194	640											3,789,798
PMT1470		3,788,653	943												3,789,596
PMT0418		3,783,990													3,783,990

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PMT3320		3,764,447	18,137												3,782,584
PMT2307		3,631,408	98,982	46,530	92	412									3,775,424
PMT2267		3,774,694													3,774,694
PMT0287	1,040,057	2,727,738													3,767,795
PMT2628	345,976	3,417,987	997												3,764,960
PMT1551		3,762,961													3,762,961
PMT0832		3,758,111													3,758,111
PMT2009		2,293,978	1,461,053												3,755,031
PMT2449		3,203,733	195,419	354,103											3,753,255
PMT2179		3,750,441	2,314												3,752,755
PMT1958		3,389,808	349,757	2,089	1,310										3,742,964
PMT2730	9,686	3,717,628	4,933												3,732,247
PMT2471	180,872	3,418,967	118,753	8,048	3,964										3,730,604
PMT1109	426,921	3,053,320	216,192	31,643											3,728,076
PMT1539	946,819	2,751,972	27,485												3,726,276
PMT3339		3,685,777	37,864												3,723,641
PMT0903		3,721,077													3,721,077
PMT3189	365,401	2,811,512	531,109	811	881										3,709,714
PMT1338		3,706,436													3,706,436
PMT2178		3,356,039	345,305												3,701,344
PMT2867	9,675	3,667,224	9,959												3,686,858
PMT2399		3,685,154													3,685,154
PMT2214		2,875,289	801,729												3,677,018
PMT2225		3,515,125	92,225	45,667	16,720	3,164									3,672,901
PMT0633		3,671,308	996												3,672,304
PMT2326	2,503,093	1,168,498													3,671,591
PMT0184	375,656	3,098,013	128,645	51,537	16,284										3,670,135
PMT0968	896,771	2,761,710	8,167	598	2,681										3,669,927
PMT0819		3,664,921													3,664,921
PMT1778	3,663,469														3,663,469
PMT2762		3,661,740													3,661,740
PMT2064		3,648,711	12,366												3,661,077
PMT2767		3,658,965													3,658,965
PMT2997		3,658,162	395												3,658,557
PMT3008	667,964	2,836,560	347,816	4,252	1,314										3,657,926
PMT1697		3,608,227	48,184												3,656,411
PMT0238	741,173	2,914,843	1												3,656,017
PMT1057		3,508,560	145,891												3,654,451
PMT2224	2,861,256	740,051	36,793	16,031											3,654,131
PMT2589	3,462,356	191,194													3,653,550
PMT2645	3,653,395														3,653,395
PMT1907		3,653,076													3,653,076
PMT1545		3,198,586	453,038	716											3,652,340
PMT0920	30,638	2,973,925	645,348												3,649,911
PMT2419		3,633,871	11,852												3,645,723
PMT3043	619,135	2,722,932	197,876	104,176											3,644,119
PMT1854		3,643,976													3,643,976
PMT1186	1,499,409	2,100,370	16,490	15,970											3,632,239
PMT1185		3,628,454													3,628,454
PMT0081		3,596,264	25,306												3,621,570
PMT2533		3,618,987													3,618,987
PMT0139	1,918,911	1,619,978	75,222	3,066											3,617,177
PMT0972		3,422,154	192,080												3,614,234
PMT1239		3,254,515	353,931												3,608,446
PMT2824	272,289	2,715,733	615,634	1,434											3,605,090
PMT0433		3,603,017	84												3,603,101
PMT0466	38,783	3,118,463	442,405												3,599,651
PMT1595		3,597,689													3,597,689
PMT1242		3,433,878	160,086												3,593,964

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT1491	3,389,660	204,156													3,593,816
PMT3256	336,912	3,205,922	41,219												3,584,053
PMT0378	3,202,872	380,900													3,583,772
PMT2475	2,921	3,555,167	24,424												3,582,512
PMT1271	3,385,916	196,085													3,582,001
PMT0076		3,581,724													3,581,724
PMT2182	2,580,827	999,522													3,580,349
PMT0354	6,336	3,570,894	1,454												3,578,684
PMT2918		3,576,447													3,576,447
PMT0494		3,566,495	1,754	2,060	160	716									3,571,185
PMT2697	171,693	3,348,857	50,206												3,570,756
PMT0018	3,570,325														3,570,325
PMT2403	350,615	3,086,306	99,876	14,922											3,561,719
PMT1244		3,560,181													3,560,181
PMT0476		3,557,434	371												3,557,805
PMT1965	424	3,555,003													3,555,427
PMT0037		3,551,002	868												3,551,870
PMT0323		1,959,562	1,585,394												3,544,956
PMT2876		3,540,777													3,540,777
PMT1607		3,482,988	52,194												3,535,182
PMT1443		3,534,225													3,534,225
PMT0703		3,533,999													3,533,999
PMT2152	116,172	3,412,960													3,529,132
PMT1043	584,347	2,843,036	99,924												3,527,307
PMT0361	5,344	3,490,106	29,685												3,525,135
PMT1790	1,376,449	2,140,912						347	1,555						3,519,263
PMT0897		3,499,574	16,651												3,516,225
PMT0451	3,276,420	226,331	12,959												3,515,710
PMT1267	384,756	3,126,144													3,510,900
PMT1701		3,510,599													3,510,599
PMT2674	29	3,509,224	719												3,509,972
PMT2746	404,495	2,930,677	105,169	68,093											3,508,434
PMT2493	53,755	3,451,905													3,505,660
PMT3100		3,491,076	12,647												3,503,723
PMT0639		3,497,738													3,497,738
PMT3177		3,496,186													3,496,186
PMT3270	707,354	2,759,377	28,797												3,495,528
PMT2107		3,494,963													3,494,963
PMT0234		3,488,299													3,488,299
PMT2353		3,484,455	31												3,484,486
PMT2209	18,005	3,462,408	2,963												3,483,376
PMT2948		3,476,153													3,476,153
PMT2483	8,040	3,464,552													3,472,592
PMT0150		3,469,769	887												3,470,656
PMT1479		1,455,759	2,013,028												3,468,787
PMT1583		3,467,707													3,467,707
PMT1377		3,467,141													3,467,141
PMT0499		3,463,604	1,777												3,465,381
PMT3031	1,670,127	1,473,478	320,549												3,464,154
PMT0852		3,125,804	334,043												3,459,847
PMT1666		1,567,297	1,891,652												3,458,949
PMT1454	219,796	3,166,813	71,243												3,457,852
PMT2820		3,456,526													3,456,526
PMT2529	1,013,749	2,393,552	39,206	5,899											3,452,406
PMT0686		3,449,407													3,449,407
PMT2881		3,314,288	132,851												3,447,139
PMT1238	3,437,123														3,437,123
PMT2977	25,916	3,382,878	25,899	288											3,434,981
PMT1346	3,190,640	235,135	5,820												3,431,595

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT0337		3,430,815													3,430,815
PMT0405		3,428,366													3,428,366
PMT0141		3,426,544													3,426,544
PMT2979		2,980,591	444,598	115	853										3,426,157
PMT2191	3,425,231														3,425,231
PMT0862	3,424,930														3,424,930
PMT1723	6,802	3,270,331	146,840												3,423,973
PMT2929	259,473	3,157,396													3,416,869
PMT0789		3,405,941	9,386												3,415,327
PMT2323	3,908	3,410,304	821												3,415,033
PMT0724		3,412,177													3,412,177
PMT1949		3,394,867	13,575	1,339											3,409,781
PMT1456	44,529	3,247,465	116,180												3,408,174
PMT0186		3,406,684	1,060												3,407,744
PMT1147		3,406,832	587												3,407,419
PMT1922		3,406,068													3,406,068
PMT2659		2,944,813	460,871												3,405,684
PMT0965	308,685	2,702,532	270,379	122,932											3,404,528
PMT0919	1,386,111	1,863,878	92,594	55,195											3,397,778
PMT0845	21,110	3,239,126	134,391												3,394,627
PMT0996	12,349	3,196,927	179,783												3,389,059
PMT2499	599,194	2,775,889													3,375,083
PMT0526		3,128,592	241,381												3,369,973
PMT1009		3,363,073													3,363,073
PMT1344	109,985	3,228,798	15,000												3,353,783
PMT3160	16,997	3,218,764	117,790												3,353,571
PMT0294	2,801,626	549,871	1,036												3,352,533
PMT0130		3,350,881													3,350,881
PMT2849		3,348,880													3,348,880
PMT1910		3,296,782	50,720												3,347,502
PMT0852	2,136,420	1,205,488													3,341,908
PMT1117		3,339,831	474												3,340,305
PMT0739	533,688	2,789,935	7,637												3,331,260
PMT2160	1,850,343	1,466,863	6,255	1,116	5,004										3,329,581
PMT2260	327,213	2,997,961	2,751												3,327,925
PMT0158		3,326,578													3,326,578
PMT3167		3,279,598	45,266												3,324,864
PMT0623		3,323,904													3,323,904
PMT2211		3,321,322													3,321,322
PMT0060	359,772	2,908,278	50,281												3,318,331
PMT0416		3,314,512	49												3,314,561
PMT0941		3,310,864													3,310,864
PMT1765		3,305,401													3,305,401
PMT2846		3,300,573													3,300,573
PMT0308		2,979,805	320,523												3,300,328
PMT0009	421,770	2,843,394	31,418												3,296,582
PMT2785		3,295,765	10												3,295,775
PMT0656		3,202,515	84,673												3,287,188
PMT2112	784,156	2,502,111													3,286,267
PMT1868		3,285,899													3,285,899
PMT2002	3,283,471														3,283,471
PMT0171	3,240,303	30,000													3,270,303
PMT0016	265,249	2,869,838	62,039	61,113	5,385	592	2,652								3,266,868
PMT2162		3,216,668	49,604												3,266,272
PMT2681		3,261,381													3,261,381
PMT2593		3,256,527													3,256,527
PMT1400		3,252,950													3,252,950
PMT1877		3,185,262	60,824												3,246,086
PMT1143	3,105,898	133,865	2,057												3,241,820

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT1671		1,973,838	1,246,899	16,612											3,237,349
PMT2456	2,612,342	433,442	179,688	5,790											3,231,262
PMT0390	745,440	2,389,210	94,859												3,229,509
PMT3120		3,221,452													3,221,452
PMT1241		3,214,638													3,214,638
PMT0222		3,212,718													3,212,718
PMT2365	505	3,205,594													3,206,099
PMT2094	3,202,255														3,202,255
PMT1298	2,435,447	763,053													3,198,500
PMT3246	2,531,593	665,137	1,431												3,198,161
PMT2016		3,193,589													3,193,589
PMT2590	14,095	3,179,178													3,193,273
PMT1024	30,179	3,161,881													3,192,060
PMT1307		3,191,326													3,191,326
PMT2718	9,750	3,168,942													3,178,692
PMT0805	10,540	2,940,367	227,080												3,177,987
PMT1608	2,324,400	849,860													3,174,260
PMT2262		3,167,408													3,167,408
PMT1507	3,065,000	95,408													3,160,408
PMT2303	320,427	2,794,735	37,448	807											3,153,417
PMT0626		3,153,286													3,153,286
PMT1521		3,147,466	3,368												3,150,834
PMT2385	99,269	3,050,713													3,149,982
PMT0474		3,143,145													3,143,145
PMT0229		3,096,159	46,583												3,142,742
PMT3162	3,132,877														3,132,877
PMT2604	6,192	3,101,461	23,949												3,131,602
PMT2860	1,898,959	1,202,615	29,604												3,131,178
PMT3082		3,129,701													3,129,701
PMT3219	3,095,427	24,974	1,871												3,122,272
PMT1439		3,121,599													3,121,599
PMT1794		3,118,343													3,118,343
PMT1941	605,132	2,512,984													3,118,116
PMT1861	2,341,059	764,069	11,784												3,116,912
PMT3304		3,112,261													3,112,261
PMT1846	195,206	2,912,342	2,439												3,109,987
PMT1564			3,103,146												3,103,146
PMT1218	14,037	3,049,933	29,994	2,767											3,096,731
PMT2683	17,367	3,064,457	9,579	512											3,091,915
PMT3295	1,028,763	2,001,758	61,342												3,091,863
PMT2180	980,207	2,046,576	39,910	23,238											3,089,931
PMT0008	897,860	1,962,539	220,939												3,081,338
PMT1310	4,435	3,075,972													3,080,407
PMT2584	3,063,672														3,063,672
PMT2016		3,059,359	266												3,059,625
PMT2793	46,827	3,012,559													3,059,386
PMT0671	27,259	3,028,074	1,972												3,057,305
PMT0181		2,989,045	65,895												3,054,940
PMT3159		3,051,804	667	414	1,845										3,054,730
PMT0916		3,054,549	91												3,054,640
PMT0012	1,300,092	1,746,862													3,046,954
PMT0664		2,422,794	616,849												3,039,643
PMT2768		3,037,402													3,037,402
PMT1306		3,034,879													3,034,879
PMT2755		3,034,363													3,034,363
PMT2461		3,030,031													3,030,031
PMT1354		3,029,752													3,029,752
PMT0921		3,029,178													3,029,178
PMT1001		3,027,056													3,027,056

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT3130	23,942	2,990,505	10,257	437											3,025,141
PMT0332	3,021,079														3,021,079
PMT0983		3,016,815	3,848												3,020,663
PMT0467		3,019,905													3,019,905
PMT2487	1,077,603	1,829,270	76,482	35,655											3,019,010
PMT1834	2,471,195	545,363	1,238												3,017,796
PMT2447	118,734	2,823,986	17,150	57,706											3,017,576
PMT1853		3,014,359													3,014,359
PMT2578		3,014,027	305												3,014,332
PMT0268	599,990	2,391,617	12,509	9,440											3,013,556
PMT2624		2,395,915	609,539	3,291											3,008,745
PMT3054	6,842	2,683,343	318,107												3,008,292
PMT2560		2,989,944	16,807												3,006,751
PMT0013		3,006,054													3,006,054
PMT0860	1,030,327	989,395	70,531	181,120	714,424	14,362									3,000,159
PMT3284		2,999,239													2,999,239
PMT1180		2,998,839													2,998,839
PMT3088	6,966	2,988,808	357												2,996,131
PMT1774	2,993,368	996													2,994,364
PMT2592	22,117	2,962,610	776												2,985,503
PMT1380		2,984,090													2,984,090
PMT2967	699,174	2,120,241	126,084	22,034	3,894										2,971,427
PMT0035	73,871	2,891,909	816	2,280											2,968,876
PMT2707	2,561,273	375,882	30,464												2,967,619
PMT2087		2,940,887	24,610												2,965,497
PMT2210	2,875	2,961,029													2,963,904
PMT1913		2,958,218	5,085												2,963,303
PMT2736	275,584	2,683,726													2,959,310
PMT2553		2,900,568	57,212												2,957,780
PMT3026		2,957,755													2,957,755
PMT0963	6,008	2,950,530	878												2,957,416
PMT1404	190,203	2,763,306	718												2,954,227
PMT0490	121,367	2,765,279	65,222	1,389	719										2,953,976
PMT1281		2,951,904													2,951,904
PMT2048		2,948,208	621												2,948,829
PMT1510		2,948,233													2,948,233
PMT1446		2,851,060	95,599												2,946,659
PMT2157	2,467,776	458,119	19,487	24											2,945,406
PMT1957		2,940,712	3,637												2,944,349
PMT1531		2,377,731	361,179	151,916	43,761	536							2,543	3,000	2,940,666
PMT2976		2,927,441	2,475	3,705											2,933,621
PMT3208	46,837	2,886,193													2,933,030
PMT0598		1,211,602	1,718,744												2,930,346
PMT1153	531	2,927,953	1,334												2,929,818
PMT2910		2,923,883	3,749												2,927,632
PMT1609		2,766,151	158,307												2,924,458
PMT1986		2,923,634													2,923,634
PMT1839	2,923,085														2,923,085
PMT3241		2,567,909	354,294												2,922,203
PMT2911		2,921,649													2,921,649
PMT2520		2,917,266													2,917,266
PMT0556	224,517	2,650,572	32,161	9,974											2,917,224
PMT1732		2,850,458	64,251												2,914,709
PMT1335	2,583,647	329,985													2,913,632
PMT2545	2,905,798														2,905,798
PMT1953		2,905,189													2,905,189
PMT1635		2,899,348													2,899,348
PMT0714		2,123,491	769,708	4,618											2,897,817
PMT0699		2,679,043	217,482												2,896,525

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PMT0795	31,147	2,820,974	43,865												2,895,986
PMT0399			2,561,793	332,938											2,894,731
PMT2832	96,404	2,354,408	425,618	15,178											2,891,608
PMT2007		2,889,974													2,889,974
PMT1478		2,871,432	16,996												2,888,428
PMT0482	1,059,170	1,820,042	8,098	490											2,887,800
PMT1688		2,886,555													2,886,555
PMT1575	2,884,632														2,884,632
PMT1825	2,881,127														2,881,127
PMT1014		2,868,618	2,139	9,590											2,880,347
PMT2728	430,569	2,448,687													2,879,256
PMT0638		2,877,990													2,877,990
PMT0439		2,873,714													2,873,714
PMT3232		2,866,248	1,847												2,868,095
PMT0851		2,849,728	15,378												2,865,106
PMT2662		2,865,062	36												2,865,098
PMT2185		2,862,544													2,862,544
PMT3059	551,001	2,311,538													2,862,539
PMT2904	25,263	2,832,283													2,857,546
PMT0806	514,177	2,295,204	46,996												2,856,379
PMT1571	3,484	2,750,252	95,106												2,848,842
PMT0642		2,847,548	158												2,847,706
PMT0733		2,846,253	1,383												2,847,636
PMT0078	2,736,296	103,902													2,840,198
PMT1359		2,839,502													2,839,502
PMT1240		2,220,429	613,273												2,833,702
PMT3145		2,832,050													2,832,050
PMT1269	2,807,391	24,591													2,831,982
PMT1047		2,829,340													2,829,340
PMT2043		2,783,393	42,018	1,446	351										2,827,208
PMT0694	212,217	2,601,224	11,454												2,824,895
PMT1447		2,824,544													2,824,544
PMT0720		2,038,041	778,924												2,816,965
PMT1322	24,629	2,789,695													2,814,324
PMT1193	2,810,472														2,810,472
PMT1469		2,807,585													2,807,585
PMT1683	282,368	2,209,744	311,957												2,804,069
PMT2690	2,795,909														2,795,909
PMT2381		2,789,000	6,279												2,795,279
PMT0380		2,794,431													2,794,431
PMT2053	226,070	2,524,608	42,838												2,793,516
PMT2992		2,791,588													2,791,588
PMT2710	324,759	2,465,434													2,790,193
PMT0580	153,130	2,408,879	205,180	17,298											2,782,487
PMT3266	813,576	1,916,366	51,720												2,781,662
PMT0198	2,779,377														2,779,377
PMT1418		2,774,383													2,774,383
PMT1831	116,378	2,652,350													2,768,728
PMT2531		160,348	924,604	1,682,560	372										2,767,884
PMT0869		2,767,529													2,767,529
PMT0251	1,035,156	1,726,897	22												2,762,075
PMT2279		2,759,185													2,759,185
PMT1591		2,495,035	34,647	168,693	59,583										2,757,958
PMT3162		2,757,267													2,757,267
PMT2085		2,756,260													2,756,260
PMT3011		2,751,076													2,751,076
PMT2205	1,854,801	839,556	15,695	40,246											2,750,298
PMT0874		2,732,671	126			2,816	12,637								2,748,250
PMT2013		2,732,408													2,732,408

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2720		471,926	2,258,876												2,730,802
PMT1124	820,838	2,064,883	44,194				97	432							2,730,444
PMT0161		2,727,319													2,727,319
PMT2809	2,712,723	9,835													2,722,558
PMT1173		2,719,455													2,719,455
PMT3299	1,309	2,716,644													2,717,953
PMT0412	2,717,373														2,717,373
PMT1822		2,648,191	62,119	5,538											2,715,848
PMT2049	3,262	2,711,289													2,714,551
PMT1741		2,713,672													2,713,672
PMT2350		2,375,418	337,178	248											2,712,844
PMT0887		2,525,080	184,926												2,710,006
PMT2242		2,457,825	249,740	564											2,708,129
PMT2694	4,086	2,701,403													2,705,489
PMT2477		2,705,300													2,705,300
PMT3213	2,972	2,693,125													2,696,097
PMT0653		2,692,890													2,692,890
PMT0520		2,686,311	395												2,686,706
PMT0103		1,454,366	1,220,340	9 543											2,684,249
PMT2641		2,675,784	30												2,675,814
PMT2938	2,318,475	355,150	648												2,674,273
PMT3049		2,671,977													2,671,977
PMT1251	804,200	1,711,543	136,573	16,731											2,669,047
PMT1108	2,665,105														2,665,105
PMT0528		2,664,905													2,664,905
PMT1084		2,643,680	21,199												2,664,879
PMT1940		2,564,323	100,151												2,664,474
PMT0058		2,564,558	99,910												2,664,468
PMT1192		2,658,757													2,658,757
PMT0718	99,751	2,530,559	17,103	10,668											2,658,081
PMT2864		2,656,587	1,114												2,657,701
PMT1837		2,657,111													2,657,111
PMT0716	123,033	2,467,205	66,279												2,656,517
PMT2360		2,654,562													2,654,562
PMT2811		2,652,412													2,652,412
PMT3326		2,630,533	18,037												2,648,570
PMT2413		2,401,758	231,519	9,026											2,642,303
PMT3315	2,305,972	334,641	968												2,641,581
PMT2968		2,639,748													2,639,748
PMT2724	169,376	2,469,312													2,638,688
PMT2270	1,070	2,635,853	7												2,636,930
PMT0024		2,636,624													2,636,624
PMT1598		1,268,723	1,367,856												2,636,579
PMT3216	30,355	1,913,656	691,352												2,635,363
PMT0326		2,633,669	395												2,634,064
PMT0742		2,632,144	5												2,632,149
PMT3046	38,866	2,534,988	57,596												2,631,450
PMT1002		2,629,943													2,629,943
PMT2579	1,412,917	1,213,525	726												2,627,168
PMT3150		2,623,039													2,623,039
PMT0829		2,619,705													2,619,705
PMT1424	21,464	2,555,694	34,966	6,739											2,618,863
PMT3323	231,051	2,383,081													2,614,132
PMT2412		2,611,439	75												2,611,514
PMT0240	4,413	2,606,701													2,611,114
PMT1565		2,610,023													2,610,023
PMT1321	24,511	2,567,489	14,456	799											2,607,255
PMT2376	5,161	2,600,480													2,605,641
PMT3047	336,596	2,266,862													2,603,458

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2652		2,599,931													2,599,931
PMT2885	36,536	2,512,865	48,343												2,597,744
PMT2428		2,579,236	16,248												2,595,484
PMT0059	817,128	1,741,489	32,146	4,078											2,594,841
PMT2685		2,584,988	4,649												2,589,637
PMT1163		2,589,418													2,589,418
PMT0143	2,531,743	55,887	1,002												2,588,632
PMT2610	403,791	1,946,666	51,704	101,364	33,279	25,631	7,174								2,569,609
PMT3062		1,719,337	850,040												2,569,377
PMT0668		2,565,734	444												2,566,178
PMT0937	30,929	2,505,368	29,040												2,565,337
PMT2257	121,543	2,397,403	44,405												2,563,351
PMT0296	1,009,234	1,511,410	42,003												2,562,647
PMT3250		2,560,928													2,560,928
PMT1409		2,560,202													2,560,202
PMT2535	634,729	1,914,506	8,977												2,558,212
PMT0572		2,556,132													2,556,132
PMT1223	2,527,168	26,650													2,553,818
PMT3110		2,550,675													2,550,675
PMT2887		2,548,179													2,548,179
PMT0579		2,538,253	8,961												2,547,214
PMT1012		2,547,163													2,547,163
PMT3053	2,546,576														2,546,576
PMT2383		2,545,364													2,545,364
PMT0876		2,386,078	148,753	3,660											2,538,491
PMT1197		2,537,692													2,537,692
PMT1107		2,530,299													2,530,299
PMT2141	156,408	2,366,606	3,444	718											2,527,176
PMT2540	2,469,280	55,859													2,525,139
PMT1399		2,524,917													2,524,917
PMT2985	1,405,703	1,108,435	9,227												2,523,365
PMT1356		2,521,821													2,521,821
PMT1714		2,520,203													2,520,203
PMT0664		2,515,309													2,515,309
PMT2521	411,761	2,078,917	24,543												2,515,221
PMT3255	2,510,633														2,510,633
PMT0820	847,732	1,539,134	114,992	6,461											2,508,319
PMT2588		2,500,081	7,089												2,507,170
PMT0112		2,506,697													2,506,697
PMT1452	2,504,939														2,504,939
PMT0562		2,492,850	9,966												2,502,816
PMT1123	756,881	1,668,831	70,996	3,552											2,500,260
PMT1067		2,495,735	1,463												2,497,198
PMT2441	2,423,745	67,988													2,491,733
PMT1782	548,594	1,939,879													2,488,473
PMT1700	2,488,256														2,488,256
PMT2325		2,484,742	3,109												2,487,851
PMT2666		2,487,446													2,487,446
PMT1083	941,753	1,513,181	27,942	111	598	458									2,484,043
PMT2355	1,066,470	1,417,410													2,483,880
PMT2495	1,436,358	1,034,597	9,083												2,480,038
PMT0086	2,477,908														2,477,908
PMT1945		2,476,665	605	6											2,477,276
PMT0055	1,090,559	1,338,433	9,354	35,849											2,474,195
PMT1855	478,393	1,950,998	44,600												2,473,991
PMT1750	4,510	2,465,760	2,447												2,472,717
PMT3277	32,037	2,439,280													2,471,317
PMT2052		2,467,160	443												2,467,603
PMT1128	14	2,466,378													2,466,392

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2004		2,298,110	167,498												2,465,608
PMT2646		2,465,330													2,465,330
PMT2401	128,304	2,264,447	70,597												2,463,348
PMT1529		2,460,801													2,460,801
PMT0020		2,460,702	26												2,460,728
PMT3025	2,310,633	142,291	3,342												2,456,266
PMT2601	2,203,405	252,009													2,455,414
PMT1066	859,002	1,495,166	76,584	16,202	7,162										2,454,116
PMT0330		2,451,269	647												2,451,916
PMT0481	139,041	1,900,580	187,944	74,848	17,600	43,880	80,294	5,880							2,450,067
PMT2243	2,450,033														2,450,033
PMT0085		2,448,066													2,448,066
PMT0688		1,332,879	981,227	131,527											2,445,633
PMT1733		2,445,599													2,445,599
PMT0401	2,154,116	290,258													2,444,374
PMT1487	74,923	2,302,318	63,907												2,441,148
PMT0061		2,437,284													2,437,284
PMT2020	179,082	2,207,781	47,025	1,930											2,435,818
PMT2375	909,253	1,447,594	76,562												2,433,409
PMT0460		2,308,256	122,745												2,431,001
PMT0470		2,430,771													2,430,771
PMT2705		2,430,334	311												2,430,645
PMT1882	250,795	2,179,658													2,430,453
PMT2430		2,428,793													2,428,793
PMT0933	148,513	2,253,535	26,403												2,428,451
PMT0133		2,422,533													2,422,533
PMT3243	2,400,110	21,000	500												2,421,610
PMT1572	18,550	2,382,445	18,627												2,419,622
PMT1048		2,419,283													2,419,283
PMT2305		2,368,251	50,159												2,418,410
PMT2658	2,318,132	99,208													2,417,340
PMT1891		2,416,640													2,416,640
PMT1046		2,407,502	6,852												2,414,354
PMT1376		2,414,169													2,414,169
PMT2047		2,369,841	41,339												2,411,180
PMT1801		2,409,986													2,409,986
PMT0885		1,267,764	759,863	382,143											2,409,770
PMT0647	118,334	2,267,648	21,482												2,407,664
PMT2582		2,168,636	232,302	4,464											2,405,402
PMT1337	2,312,850	91,094													2,403,944
PMT0359		2,027,465	372,198	773											2,400,436
PMT1151		2,397,876	305												2,398,181
PMT0162	86,667	2,307,828													2,394,495
PMT0318		2,325,187	69,224												2,394,411
PMT0850	900,619	1,492,844													2,393,463
PMT0546		2,389,333													2,389,333
PMT0026		2,092,904	293,545												2,386,449
PMT2192		2,318,768	67,015												2,385,783
PMT1800		2,385,339													2,385,339
PMT2655		2,382,363	892												2,383,255
PMT1905	19,478	2,158,422	190,005	8,791	2,666	116									2,379,478
PMT1594	2,376,008														2,376,008
PMT1195		2,374,764													2,374,764
PMT0722		2,374,262													2,374,262
PMT1315	2,373,426														2,373,426
PMT3252		2,371,756													2,371,756
PMT1992	2,370,072														2,370,072
PMT2246		2,369,444	134												2,369,578
PMT1393		2,366,041	1,205												2,367,246

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT0276		2,358,237	6,246												2,364,483
PMT0383	2,351,058	13,131													2,364,189
PMT2721	2,363,989														2,363,989
PMT1983		2,363,416													2,363,416
PMT1920		1,674,058	688,160												2,362,218
PMT1490		2,355,727	6,307												2,362,034
PMT1535		2,359,293	159												2,359,452
PMT3240	566,239	1,791,798	1,370												2,359,407
PMT0936		2,359,397													2,359,397
PMT1931	722,364	1,636,377													2,358,741
PMT1950	1,759,586	516,803	81,810												2,358,199
PMT0507	475,439	1,871,927	10,805	19											2,358,190
PMT2878		2,347,891	4,829	2,992	1,476			783							2,357,971
PMT0092		2,356,769													2,356,769
PMT1017	1,245,739	1,105,416	4,920												2,356,075
PMT1540	80,704	2,267,339	7,905												2,355,948
PMT1391	804,898	1,539,171	10,438												2,354,507
PMT0712		1,247,588	1,105,542												2,353,130
PMT1860	384,651	1,830,446	136,549												2,351,646
PMT0637		2,349,161													2,349,161
PMT1287	120,790	2,224,693													2,345,483
PMT1087	702,983	1,543,794	83,873	3,491	3,569	382	1,713								2,339,785
PMT3321		2,338,784													2,338,784
PMT1872		2,289,861	46,297												2,336,158
PMT2981	6,992	2,255,842	55,741	17,266											2,335,841
PMT3313	258,891	2,076,284													2,335,175
PMT3300	405,006	1,657,060	270,561												2,332,627
PMT1485		2,331,850													2,331,850
PMT0909	2,938	2,301,025	17,724	10,159											2,331,846
PMT0180		2,325,521													2,325,521
PMT2096	1,353,553	971,494													2,325,047
PMT1806	210,274	1,878,040	236,004												2,324,318
PMT0362		2,141,163	180,352												2,321,515
PMT1753	576,691	1,519,249	51,796	172,932											2,320,668
PMT3070		2,320,488													2,320,488
PMT2496		2,319,819													2,319,819
PMT2678		1,934,272	271,303	114,040											2,319,615
PMT1804	1,035,017	1,278,867	4,944												2,318,828
PMT2083		2,318,524													2,318,524
PMT2946	2,315,917														2,315,917
PMT0411		2,301,590	11,433												2,313,023
PMT1059	635,434	1,659,311	15,942												2,310,687
PMT0531	49,200	2,260,328													2,309,528
PMT0752	79,486	2,229,879													2,309,365
PMT1372	74,875	2,232,765													2,307,640
PMT0834		2,305,302	473												2,305,775
PMT1660		2,303,990													2,303,990
PMT3056		2,196,699	104,681												2,301,380
PMT0437		2,300,724													2,300,724
PMT3124	4,623	1,950,965	317,039	19,201	6,498										2,298,326
PMT0149		1,997,229	298,934												2,296,163
PMT1202	874	2,292,513	1,429												2,294,816
PMT0545	687,249	1,554,250	51,902	586											2,293,987
PMT2818	13,880	2,268,135	1,084	1,986	2,524	2,024									2,289,633
PMT3041		2,287,337													2,287,337
PMT0527		2,286,260													2,286,260
PMT0441	278,394	2,005,683													2,284,077
PMT0087	952,590	1,326,375	780												2,279,745
PMT1833		2,279,202													2,279,202

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT1867	1,986,561	287,965													2,274,526
PMT2616		2,273,782	607												2,274,389
PMT2960	438,822	1,736,331	95,538		95	515	414								2,273,715
PMT0256		2,273,351													2,273,351
PMT0075	20,157	2,251,318													2,271,475
PMT0320		2,209,083	33,050	3,788	15,033	911									2,261,865
PMT1038	696,536	1,509,774	41,471	11,329	886	240	1,075								2,261,311
PMT0749		2,234,494	26,070												2,260,564
PMT1011	440,022	1,818,962													2,258,984
PMT1813		2,226,173	28,883	1,733											2,258,789
PMT0855		2,194,523	59,316												2,253,839
PMT2671	1,751,142	500,393													2,251,535
PMT2424	31,048	2,107,416	109,229	2,462											2,250,155
PMT2259	103,063	2,129,538	14,966	949											2,248,516
PMT2742		2,246,168													2,246,168
PMT0212	1,277,134	964,409	2,757												2,244,300
PMT0641		1,683,735	552,677												2,236,412
PMT0589		2,115,398	118,319	1,511											2,235,228
PMT2934		2,235,029													2,235,029
PMT0994	75,978	2,156,956													2,232,934
PMT0727		2,133,824	96,483												2,230,307
PMT3143		2,229,215													2,229,215
PMT1803		2,227,092													2,227,092
PMT0106	1,050,821	1,160,067	10,620												2,221,508
PMT2945	2,214,874	1,454													2,216,328
PMT1408	1,871,991	344,146													2,216,137
PMT2321		1,770,640	243,807	201,309											2,215,756
PMT1433	50,628	2,107,321	57,326												2,215,275
PMT1181		2,051,231	161,274												2,212,505
PMT0030		2,211,783													2,211,783
PMT1027	2,206,072	3,033													2,209,105
PMT1105	1,884,724	324,081													2,208,805
PMT3087	1,523,294	634,131	45,993	5,347											2,208,765
PMT1170		2,201,923	254												2,202,177
PMT0452	2,198,741														2,198,741
PMT1039		2,197,272													2,197,272
PMT2131		2,182,023	9,605												2,191,628
PMT1582		2,191,551													2,191,551
PMT0426	1,217,596	972,899													2,190,495
PMT3010		2,180,243	6,966												2,187,209
PMT1428		2,186,946													2,186,946
PMT1932	2,151,748	34,091													2,185,839
PMT2962	10,188	2,173,135													2,183,323
PMT1566		2,182,331													2,182,331
PMT1493		2,180,969													2,180,969
PMT2410		2,176,166	921												2,177,087
PMT0761		2,174,165													2,174,165
PMT2551		2,169,332													2,169,332
PMT2614		2,149,814	17,950	125											2,167,889
PMT0563	4,421	2,160,803	343												2,165,567
PMT0373	1,743,013	416,157	2,231												2,161,401
PMT0728		1,956,294	203,080												2,159,374
PMT2054	387,931	1,763,830	7,112												2,158,873
PMT2233		2,131,822	14,118	11,801											2,157,741
PMT1508		2,157,291													2,157,291
PMT0613		2,041,675	114,973												2,156,648
PMT0132	2,152,462														2,152,462
PMT2745		2,152,078													2,152,078
PMT2777		2,151,395													2,151,395

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT1423		2,149,910													2,149,910
PMT0387		2,133,354	15,508												2,148,862
PMT0811	781,733	1,364,151		509	2,281										2,148,674
PMT1415		2,147,429													2,147,429
PMT0317		2,145,336													2,145,336
PMT3342		2,143,068													2,143,068
PMT0327		1,332,724	809,627												2,142,351
PMT2654	363,636	1,567,333	211,089												2,142,058
PMT0514	58,041	2,072,903	8,326												2,139,270
PMT1919	817,659	1,237,267	81,368	979						759					2,136,032
PMT0289	13,075	2,121,647	1,268												2,135,990
PMT2795	79,565	2,049,366	5,541												2,134,472
PMT1044	3,895	2,080,332	48,554	958											2,133,739
PMT1099	318,037	1,807,056	7,238												2,132,331
PMT2748		2,131,978													2,131,978
PMT0435		2,130,329													2,130,329
PMT2779		2,111,428	18,852												2,130,280
PMT0253		2,127,852													2,127,852
PMT0783	96,749	1,969,660	43,577	17,458											2,127,444
PMT2780		2,126,801													2,126,801
PMT0376		2,125,582													2,125,582
PMT2903	77,203	2,041,688	698	849	3,787										2,124,225
PMT0073		2,123,745													2,123,745
PMT0331	2,079,797	42,980													2,122,777
PMT0099		2,121,732	241												2,121,973
PMT1602	1,749,617	371,769													2,121,386
PMT3115	109,457	2,009,387													2,118,844
PMT2564		2,116,498													2,116,498
PMT1451		1,841,502	59,669	214,905											2,116,076
PMT2347	18,496	1,896,850	164,582	32,719											2,112,647
PMT2408		2,060,343	51,430												2,111,773
PMT1007	999,052	975,118	136,900												2,111,070
PMT0147		2,109,648													2,109,648
PMT1628	2,109,121														2,109,121
PMT2084	530	2,106,168													2,106,698
PMT3337	953,904	1,127,818	20,523												2,102,245
PMT3018	974	2,100,684													2,101,658
PMT2452	1,389,848	695,119	15,842												2,100,809
PMT0533		1,971,732	125,577												2,097,309
PMT2035	2,096,935														2,096,935
PMT1826	82,867	1,950,509	62,136												2,095,512
PMT0269	2,093,449														2,093,449
PMT1070		2,083,461	5,000												2,088,461
PMT0108		2,083,421	4,408												2,087,829
PMT0549		2,086,341													2,086,341
PMT3200		2,086,121													2,086,121
PMT0249	469,608	1,608,453	9,846												2,085,907
PMT0001		1,998,439	86,534												2,084,973
PMT1696	745,295	1,323,696	14,936												2,083,927
PMT3276	421,921	1,555,816	105,072												2,082,809
PMT2684		2,080,121													2,080,121
PMT3044	192,858	1,796,910	90,052												2,079,820
PMT3194		2,078,574													2,078,574
PMT0187		2,067,338	1,222	3,911	1,691	576	899	2,415							2,078,052
PMT2581	1,847,735	228,683													2,076,418
PMT2363	34,540	2,017,391	24,461												2,076,392
PMT2144	1,190,627	883,557													2,074,184
PMT0208	1,855,750	169,818	47,343												2,072,911
PMT1414	348,225	1,696,732	25,314	942											2,071,213

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2300	355,546	1,698,963	4,633	11,927											2,071,069
PMT0979	150,272	1,876,347	43,994												2,070,613
PMT3091	1,601,293	467,551													2,068,844
PMT1272	1,615,954	448,494	2,374												2,066,822
PMT1468		2,066,093													2,066,093
PMT1822		2,065,976													2,065,976
PMT0144		2,064,046	546												2,064,592
PMT1259		2,058,947													2,058,947
PMT1309		2,056,907													2,056,907
PMT2310	1,647,552	208,016	576												2,056,144
PMT0199		2,053,149													2,053,149
PMT0522		2,052,971													2,052,971
PMT1368		2,052,764													2,052,764
PMT2567		2,017,516	33,034												2,050,550
PMT0223		2,049,888													2,049,888
PMT2749		1,869,694	177,956												2,047,650
PMT1858		2,047,308													2,047,308
PMT0831		1,647,285	368,307	29,278											2,044,870
PMT2213	344,033	1,700,527													2,044,560
PMT0593		2,026,210	15,273												2,041,483
PMT0343	472,713	1,535,463	24,741												2,032,917
PMT3048		2,032,721													2,032,721
PMT2758		1,806,794	176,221	45,992	3,423										2,032,430
PMT1370	6,931	1,923,588	87,255	11,506											2,029,280
PMT0680	1,656,860	372,119													2,028,979
PMT1442		1,674,813	354,090												2,028,903
PMT2889		2,023,359	15												2,023,374
PMT3273		2,021,757													2,021,757
PMT2171		2,020,613													2,020,613
PMT3042		2,019,323													2,019,323
PMT0145		1,885,527	133,222												2,018,749
PMT1114		1,622,231	396,148												2,018,379
PMT1280		2,018,346													2,018,346
PMT0168	787,792	1,229,446													2,017,238
PMT0371		2,015,201													2,015,201
PMT0809		1,873,915	134,397		1,473										2,009,785
PMT2766	280,970	1,660,827	44,211												2,006,008
PMT2448	1,972,437	16,494	16,469												2,005,400
PMT2121		2,004,208	327												2,004,535
PMT2281	1,995,229	3,624													1,998,853
PMT0365		1,998,676													1,998,676
PMT1672	1,998,606														1,998,606
PMT0847		1,997,959													1,997,959
PMT1542		1,994,712	2,658												1,997,370
PMT2944	2,827	1,929,376	64,672												1,996,875
PMT1042	84,444	1,909,819													1,994,263
PMT1730		1,988,133													1,988,133
PMT3051	914,458	1,072,538													1,986,996
PMT1045	2,011	1,982,394													1,984,405
PMT1623	45,043	1,858,046	80,474												1,983,563
PMT1645		1,980,141													1,980,141
PMT1870		1,615,864	363,110												1,978,974
PMT3022		1,977,383													1,977,383
PMT1146		1,976,516													1,976,516
PMT0848	37,599	1,800,923	137,683												1,976,205
PMT2699		1,681,709	294,358												1,976,067
PMT3248		1,974,852													1,974,852
PMT0797		1,950,853	22,049												1,972,902
PMT1745	96,912	1,873,280													1,970,192

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT1669		1,968,947	205												1,969,152
PMT0340	1,968,894														1,968,894
PMT1162	1,936,838	30,576													1,967,414
PMT2573	805,611	1,121,195	37,807												1,964,613
PMT1899		1,949,504	13,745												1,963,249
PMT0427	377,494	1,442,312	142,538												1,962,344
PMT3086	10,481	1,859,631	89,101												1,959,213
PMT2696	29,356	1,926,620	1,725												1,957,701
PMT2882	879,785	1,076,289	112												1,956,186
PMT3347	27,739	1,927,645													1,955,384
PMT2373		1,937,513	15,320	897											1,953,730
PMT3340		1,948,736	4,671												1,953,407
PMT1897		1,953,377													1,953,377
PMT2212		1,951,267													1,951,267
PMT1016	1,949,512														1,949,512
PMT1426	1,369,212	580,071													1,949,283
PMT0049		1,945,503													1,945,503
PMT1893		1,774,958	156,387	13,968											1,945,313
PMT1168	25,802	1,754,353	164,448	625											1,945,228
PMT1205	478,312	1,400,827	65,062												1,944,201
PMT1959	114,820	1,473,082	151,586	204,009											1,943,497
PMT0011	39,184	1,593,071	308,005												1,940,260
PMT1937		1,940,208													1,940,208
PMT2989		1,915,038	22,523												1,937,561
PMT2148	1,936,042														1,936,042
PMT0407	1,935,321														1,935,321
PMT1461	125,067	1,809,918													1,934,985
PMT1229			690,560	1,243,955											1,934,515
PMT2187	11,073	1,921,781													1,932,854
PMT2352	1,555,969	370,460	2,411												1,928,840
PMT0744		1,927,414													1,927,414
PMT1555	611,665	1,299,027	15,200												1,925,892
PMT2753	1,019,481	884,284	21,895												1,925,660
PMT1744	616,290	1,257,251	20,665	30,955											1,925,161
PMT3222	768,610	1,138,966	16,280												1,923,856
PMT1183	85,508	1,561,577	286,602	8,226											1,921,813
PMT0854		1,921,589													1,921,589
PMT2577	1,921,338														1,921,338
PMT1273	311,885	1,595,791	13,351												1,921,027
PMT2404	160,238	1,759,902													1,920,140
PMT2517		1,919,683													1,919,683
PMT0322		1,919,097													1,919,097
PMT0987		1,917,839	1,169												1,919,008
PMT0334	883,460	1,029,280	2,617												1,915,357
PMT1148		1,914,518													1,914,518
PMT0241	437,495	1,476,117													1,913,612
PMT3201		1,912,776													1,912,776
PMT1592	54,190	1,857,849	115												1,912,154
PMT3092	507,105	1,394,166	9,539												1,910,810
PMT2901		1,907,746	440												1,908,186
PMT0564	1,907,879														1,907,879
PMT3334	679,512	1,227,299													1,906,811
PMT3179	24,910	1,859,848	20,957												1,905,715
PMT2505		1,903,665	257	1,151											1,905,073
PMT1578		1,173,088	731,453												1,904,541
PMT3278	6,164	1,890,734	3,822	694	3,096										1,904,510
PMT2516		1,903,528													1,903,528
PMT0599	34,905	1,856,102	10,591												1,901,598
PMT0953		1,900,843													1,900,843

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT1492	6,692	1,887,712	5,492												1,899,896
PMT1712		1,877,242	13,296	8,636											1,899,174
PMT0297		1,898,702													1,898,702
PMT1816		1,897,752													1,897,752
PMT1022		1,897,045													1,897,045
PMT0910	288,359	1,608,573													1,896,932
PMT2030		1,892,130	2,971												1,895,101
PMT0345	1,894,928														1,894,928
PMT1388		1,890,465													1,890,465
PMT0131	1,260,391	621,053	8,282												1,889,726
PMT0601	69,575	1,746,693	72,103												1,888,371
PMT1865		1,886,969													1,886,969
PMT1625		1,815,255	71,177												1,886,432
PMT2292	1,880,277														1,880,277
PMT2421		1,879,848													1,879,848
PMT1015	1,549,272	322,719	7,346												1,879,337
PMT0895	53,460	1,681,303	65,628	78,764											1,879,155
PMT0643		1,669,385	209,660												1,879,045
PMT2908		1,250,848	627,811												1,878,659
PMT0977		1,740,729	136,987												1,877,716
PMT2231	58,116	1,696,878	110,270		2,177	9,765									1,877,206
PMT1413		1,876,565	213												1,876,778
PMT1896		1,511,470	358,568	1,281											1,871,319
PMT0282	62,378	1,723,728	84,087												1,870,193
PMT0138	8,140	1,856,286	7,198												1,869,634
PMT1132	812,331	983,291	73,124												1,868,746
PMT3227		1,867,972													1,867,972
PMT0553		1,865,440													1,865,440
PMT3104	125,163	1,717,541	20,394												1,863,098
PMT0493		1,859,168	2,876												1,862,044
PMT2921		1,861,784													1,861,784
PMT0928	140,530	1,720,834													1,861,364
PMT1308	236,175	1,624,268	917												1,861,360
PMT1457	1,860,843														1,860,843
PMT0860	485,762	1,374,780													1,860,542
PMT2104		1,673,388	186,843												1,860,231
PMT2913		1,787,150	67,374	3,437											1,857,961
PMT0807		1,857,950													1,857,950
PMT1486		1,857,866													1,857,866
PMT3057	1,854,834														1,854,834
PMT0291		1,854,309													1,854,309
PMT0309		1,852,062													1,852,062
PMT0695	1,082,428	605,530	182,200												1,850,158
PMT1458	1,086,733	715,077	48,095												1,849,905
PMT1312	416,273	1,411,218	10,843	9,936											1,848,270
PMT3254	96,816	1,750,724													1,847,540
PMT2872		1,846,827													1,846,827
PMT2635	504,665	1,339,496	2,299												1,846,460
PMT2256	115,956	1,720,802	9,112												1,845,870
PMT1752		1,747,815	96,605	1,198											1,845,618
PMT0090	659,019	1,163,663	16,152	3,144											1,841,978
PMT2312	24,553	1,706,324	110,613												1,841,490
PMT1653		1,839,369													1,839,369
PMT0227	1,432,811	400,890	5,516												1,839,217
PMT0205		1,837,114													1,837,114
PMT0538		1,769,818	63,183												1,833,001
PMT0496	1,822,104	5,816	3,074												1,830,994
PMT1781		1,830,760													1,830,760
PMT2044		1,830,526													1,830,526

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT0861	1,054,137	770,561	674												1,825,372
PMT0842	454,840	1,369,937													1,824,777
PMT3260	123,288	1,701,216													1,824,504
PMT2764		1,823,198													1,823,198
PMT2342	679	1,818,621	173												1,819,473
PMT1767	486,508	1,332,224													1,818,732
PMT0508		1,818,313													1,818,313
PMT2649	73,079	1,337,768	396,782	10,154											1,817,783
PMT0290		1,814,217	2,431												1,816,648
PMT1005	1,704,957	108,463													1,813,420
PMT1691	1,812,685														1,812,685
PMT1626	1,812,548														1,812,548
PMT1641	262,448	1,538,092	11,179												1,811,719
PMT0701		1,804,561	6,331	36											1,810,928
PMT2606		1,564,417	245,933												1,810,350
PMT0213	47,752	1,547,841	214,325												1,809,918
PMT1286	665	1,806,911													1,807,576
PMT1629	152,833	1,544,389	99,415	7,623											1,804,260
PMT2479		1,803,453	94												1,803,547
PMT1638		1,489,540	308,755		873	3,916									1,803,064
PMT2771	581,213	1,210,813	10,670												1,802,696
PMT2612		1,770,243	31,545												1,801,788
PMT2197		1,776,027	24,902												1,800,929
PMT2937	338,268	1,355,823	103,835	259	820										1,799,005
PMT0385	1,227,885	570,603													1,798,488
PMT2963	316,927	1,479,980													1,796,907
PMT3205	793,357	1,002,805													1,796,162
PMT0370	711,604	1,080,257	4,245												1,796,106
PMT1230		1,795,204													1,795,204
PMT0767		1,790,626	532												1,791,158
PMT3166	728,200	295,386	765,114		288	1,289									1,790,277
PMT2427		1,785,706	1,063												1,786,769
PMT1214	473,758	1,298,918	14,520												1,785,196
PMT3005		1,784,545													1,784,545
PMT0821	768,152	980,099	34,565												1,782,816
PMT1178	1,374,128	406,180	1,662												1,781,970
PMT1285		1,780,164													1,780,164
PMT0588		1,767,651	8,475												1,776,126
PMT2868		1,775,203													1,775,203
PMT1696		1,773,324													1,773,324
PMT0856	1,482,993	285,676													1,768,669
PMT0116	245,685	1,460,083	62,294												1,768,062
PMT2251		1,765,882	724												1,766,606
PMT3112		1,765,192													1,765,192
PMT1874		1,740,366	24,444												1,764,810
PMT0316		1,741,892	22,575												1,764,467
PMT2284		1,763,122													1,763,122
PMT2534	185,955	563,586	670,039	343,484											1,763,064
PMT0844	320,098	1,396,556	45,666												1,762,320
PMT1930	63,631	1,642,001	56,359												1,761,991
PMT2751	1,760,279														1,760,279
PMT3107		1,742,263	17,368												1,759,631
PMT0250		1,759,430													1,759,430
PMT2082	1,213,897	520,304	24,025												1,758,226
PMT2701		1,754,930	1,002												1,755,932
PMT0807	1,734,301	19,958													1,754,259
PMT3144		1,753,442													1,753,442
PMT2664		1,667,617	85,806												1,753,423
PMT1793		1,752,300													1,752,300

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PMT0882	487,581	1,048,017	210,111												1,745,709
PMT1830	1,619,256	124,471													1,743,727
PMT0022		1,743,384													1,743,384
PMT3274	836,556	905,982													1,742,538
PMT2501		1,741,995													1,741,995
PMT2530		1,741,167													1,741,167
PMT0578	1,733,705	7,375													1,741,080
PMT3233		1,691,403	48,897												1,740,300
PMT0872	165,744	1,569,595	4,699												1,740,038
PMT1411		1,738,813													1,738,813
PMT0443		1,587,530	149,276	745											1,737,551
PMT0188	987,046	749,685													1,736,731
PMT2562	409,376	1,239,030	88,070												1,736,476
PMT0975		1,734,098													1,734,098
PMT2752	303,315	1,420,100	10,465												1,733,880
PMT2760	447,971	1,284,910													1,732,881
PMT1078	675,614	1,031,524	25,672												1,732,810
PMT0500		1,014,466	718,233												1,732,699
PMT0817	1,731,918														1,731,918
PMT3261	305,753	1,424,747	894												1,731,394
PMT1656	600,441	1,123,751	5,261												1,729,453
PMT1253		1,729,185													1,729,185
PMT2879		1,728,137	480												1,728,617
PMT0351	244,942	1,396,630	85,874												1,727,446
PMT2782		1,439,298	284,055												1,723,353
PMT2313	9,998	1,710,698													1,720,696
PMT2703	1,719,099														1,719,099
PMT0281		1,718,761													1,718,761
PMT1497	69,053	1,649,584													1,718,637
PMT2847		1,716,929													1,716,929
PMT0040	1,640,655	74,235	1,539												1,716,429
PMT0935		1,669,469	44,533	1,044	176	787									1,716,009
PMT1646	135,468	1,427,499	152,595												1,715,562
PMT3268		1,660,595	48,595		984	4,416									1,714,590
PMT2395		996,356	718,133												1,714,489
PMT2914	1,711,392														1,711,392
PMT0034	432,015	1,067,211	211,038	678											1,710,942
PMT2845		1,710,842													1,710,842
PMT0118		1,708,766	521	2,331											1,709,618
PMT1557		1,707,895													1,707,895
PMT0025		1,704,337													1,704,337
PMT1770		1,599,147	104,809												1,703,956
PMT1058	405,287	1,279,448	16,089												1,700,824
PMT2129		1,698,765													1,698,765
PMT2341	87,697	1,610,130													1,697,827
PMT3119	180,672	1,513,634													1,694,306
PMT1154		1,617,423	66,567		714	3,811	1,987								1,690,502
PMT1336	151,804	1,537,972													1,689,776
PMT2023	556,363	1,079,512	23,915	29,770											1,689,560
PMT0057	1,036,674	649,336													1,686,010
PMT2883	412,826	1,273,103													1,685,929
PMT1831	1,218,293	450,559	15,358	166											1,684,376
PMT3310	10,360	1,651,408	18,906	474	2,125										1,683,273
PMT1140		1,639,062	42,935												1,681,997
PMT1134	594,496	943,393	143,227												1,681,116
PMT0818	717,801	942,668	20,400												1,680,869
PMT3316	1,011,175	668,065													1,679,240
PMT0675		1,678,683													1,678,683
PMT0477	243,628	1,433,987													1,677,615

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT2731	56,086	1,537,311	81,992												1,675,389
PMT1092		1,039,917	634,426												1,674,343
PMT2061		1,674,330													1,674,330
PMT1553	570,627	1,101,323	1,137	619											1,673,706
PMT2136		736,686	917,946	18,969											1,673,601
PMT0602		1,669,977	3,461												1,673,438
PMT2927		892,658	780,579												1,673,237
PMT2627	52,017	1,613,015	6,703												1,671,735
PMT1881		415,526	1,248,339	7,590											1,671,455
PMT2393		1,670,154													1,670,154
PMT0033	277,994	1,383,817	6,951	1,057											1,669,819
PMT1757		1,668,142	327												1,668,469
PMT2190	194,874	1,449,903	23,651												1,668,428
PMT0183	1,724	1,636,406	28,608	394											1,667,132
PMT1599	337,536	1,214,551	112,385	2,139											1,666,611
PMT1180	167,705	1,487,525	10,797												1,666,027
PMT0469	107,269	1,538,442	18,883												1,664,594
PMT2119		1,664,405													1,664,405
PMT0484		1,662,566													1,662,566
PMT0314		1,455,551	205,383												1,660,934
PMT2581		1,660,449													1,660,449
PMT1962		1,615,786	41,791	1,932	422										1,659,931
PMT1746	178,039	1,480,130													1,658,169
PMT0064	1,155,049	501,791													1,656,840
PMT1587	268,066	1,384,216	4,036												1,656,318
PMT0644	5,285	1,650,384													1,655,669
PMT1296		1,463,868	191,763												1,655,631
PMT2924		1,654,315	165												1,654,480
PMT3140	1,362,363	289,367													1,651,730
PMT3036	124,750	1,526,079													1,650,829
PMT2702		1,636,696	12,529												1,649,225
PMT3192	41,150	1,538,494	68,266												1,647,910
PMT2498	839,940	683,262	22,591	101,366											1,647,159
PMT3330		1,623,099	23,938												1,647,037
PMT1121	573,937	1,049,953	19,803	3,163											1,646,856
PMT3015		1,565,546	80,514												1,646,060
PMT0381	61,487	1,557,052	21,960	3,993											1,644,512
PMT1025		1,595,335	47,899												1,643,234
PMT0986		1,618,330	24,425												1,642,755
PMT1667		1,338,359	298,870	5,165											1,642,394
PMT0043	1,641,358														1,641,358
PMT2828	61,083	1,573,151	7,062												1,641,296
PMT1149		1,450,555	188,135												1,638,690
PMT1373		1,625,073	13,130												1,638,203
PMT1444		1,638,093													1,638,093
PMT2032	1,070,430	567,238													1,637,668
PMT0172		1,636,773													1,636,773
PMT1817	859,980	733,400	43,389												1,636,769
PMT0403	1,522,410	104,871	8,785												1,636,066
PMT2607		1,635,867													1,635,867
PMT2358		1,635,644													1,635,644
PMT2738		1,635,432													1,635,432
PMT2548	7,773	1,407,919	218,816												1,634,508
PMT1624		1,631,512	521												1,632,033
PMT0242	55,484	1,561,261	13,589	235	1,045										1,631,614
PMT2630	97,988	1,455,628	76,963												1,630,579
PMT2336		1,627,424	1,010												1,628,434
PMT2554		560,143	1,068,049												1,628,192
PMT0109		1,628,163													1,628,163

Permit Number	Cards	Letters												Total
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PMT1775		1,085,629	542,156												1,627,785
PMT0285	351,425	168,994	1,107,923												1,626,342
PMT2732		1,626,185													1,626,185
PMT2482		1,624,140													1,624,140
PMT0955	202,003	1,324,460	96,155	1,249											1,623,867
PMT1975		1,354,686	219,816	42,214	6,501										1,623,217
PMT0770		1,622,559	14												1,622,573
PMT1987		1,621,008	122												1,621,130
PMT2629		1,033,030	587,549	276											1,620,855
PMT1889		1,620,734													1,620,734
PMT0981	493,359	1,102,941	20,981	3,255											1,620,536
PMT0547	64,560	1,397,608	157,621												1,619,789
PMT1713	129,203	1,461,615	27,487												1,618,305
PMT2902	673,438	898,589	45,041												1,617,068
PMT1926		1,616,832													1,616,832
PMT0273	836,905	599,275	171,751		1,623	7,276									1,616,830
PMT1246		1,615,599													1,615,599
PMT2432		1,615,049													1,615,049
PMT1604		1,612,739													1,612,739
PMT3190	1,612,549														1,612,549
PMT3151	174,858	1,437,657													1,612,515
PMT2596		1,591,718	18,820												1,610,538
PMT0091		1,610,108													1,610,108
PMT3161		1,597,908	11,158												1,609,066
PMT0368		1,608,839													1,608,839
PMT0480		1,608,058													1,608,058
PMT0239	1,186,477	398,300	22,907												1,607,684
PMT0006		1,459,608	142,500	4,829											1,606,937
PMT1514		1,605,950													1,605,950
PMT0840	13,029	1,591,581													1,604,610
PMT3297		1,601,310													1,601,310
PMT2638	180,492	760,874	659,074												1,600,440
PMT2995		1,600,150													1,600,150
PMT1990		1,595,740	1,577												1,597,317
PMT0065	183,202	1,409,971	3,837												1,597,010
PMT3231	60,064	1,536,776													1,596,840
PMT3039		1,594,248													1,594,248
PMT0083	958,732	628,583	4,254	612	740										1,592,921
PMT1954		1,591,996	716												1,592,712
PMT0951	38,378	1,427,075	92,331	30,295	1,786	416									1,590,261
PMT2692		1,587,487													1,587,487
PMT2796	5,494	1,559,503	21,925												1,586,922
PMT0041		1,584,990													1,584,990
PMT0643	583,558	419,995	577,774												1,581,327
PMT2366	24,537	1,555,867													1,580,404
PMT1208	1,310,426	211,364	57,707												1,579,497
PMT1056		1,577,764													1,577,764
PMT1597		1,575,917	105												1,576,022
PMT1243		1,575,479	85												1,575,564
PMT1590	72,295	1,501,535		94	417										1,574,341
PMT0503		1,568,831	5,347												1,574,178
PMT1885	526,013	1,047,711													1,573,724
PMT1052		1,573,065	547												1,573,612
PMT0940	619,232	943,809	10,412												1,573,453
PMT2264	305,216	1,262,458	5,116												1,572,790
PMT0649	1,572,780														1,572,780
PMT2930	1,286	1,571,251	30												1,572,567
PMT2193	373,682	1,022,314	175,437												1,571,433
PMT0930		764,653	623,129	181,710	724										1,570,216

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PMT1506	639,673	929,144													1,568,817
PMT3229		1,567,389													1,567,389
PMT2075	447,831	1,086,545	32,543												1,566,919
PMT2146	88,534	1,469,492	4,815	3,764											1,566,605
PMT3331		138,471	1,410,172	16,280											1,564,923
PMT1257	573,963	838,813	147,258	582											1,560,616
PMT2027	489,750	1,068,167													1,557,917
PMT1611	442,756	1,051,419	61,105												1,555,280
PMT0235	126,533	1,384,881	43,569												1,554,983
PMT2065		1,552,530													1,552,530
PMT1998	993,004	557,037	1,360												1,551,401
PMT1113	1,145,647	404,590													1,550,237
PMT0272		1,550,097													1,550,097
PMT1438		1,188,680	361,083												1,549,763
PMT3170		1,541,677	7,382	595											1,549,654
PMT1165		1,548,830													1,548,830
PMT0105	108,862	1,414,196	27,339												1,548,397
PMT2101	52,994	1,285,268	209,989												1,548,251
PMT3171	130,590	1,407,008	10,608												1,548,206
PMT0445		1,547,824													1,547,824
PMT0295	33,056	1,513,774													1,546,830
PMT0488	611,926	933,576													1,545,502
PMT2866		1,344,038	200,089												1,544,127
PMT3108	5,818	1,424,596	113,178												1,543,592
PMT1807		1,541,074	2,078												1,543,152
PMT2617		1,540,564													1,540,564
PMT2558		1,539,615													1,539,615
PMT0635	28,862	1,509,311													1,538,173
PMT0836		1,239,795	296,940												1,536,735
PMT3191		1,528,072	8,629												1,536,701
PMT1063		1,535,780													1,535,780
PMT3230	341,640	1,119,888	73,802												1,535,330
PMT0079	133,808	1,385,131	13,298	2,786											1,535,023
PMT2221		1,308,057	119,642	107,194											1,534,893
PMT2734		1,531,516	1,921												1,533,437
PMT2058		1,532,364	18												1,532,382
PMT0232	137,000	1,359,056	35,661												1,531,717
PMT0689	453,581	794,890	247,089	35,851											1,531,411
PMT1938	264,546	1,266,142													1,530,688
PMT1292		1,415,071	115,249												1,530,320
PMT1513	148,245	1,334,058	37,255	10,443											1,530,001
PMT2382		1,529,492													1,529,492
PMT2378		1,529,133													1,529,133
PMT1603	653,480	824,226	50,529												1,528,235
PMT0346		1,525,564													1,525,564
PMT0231	41,517	1,427,181	56,830												1,525,528
PMT2739		1,440,089	82,272												1,522,361
PMT2034		1,521,566													1,521,566
PMT2237	519,057	919,043	83,135												1,521,235
PMT1233		1,519,473	920												1,520,393
PMT2608	392,016	1,128,254													1,520,270
PMT1410		1,519,837													1,519,837
PMT2010	868,621	644,677	6,009												1,519,307
PMT0094		1,517,191													1,517,191
PMT0457		1,516,750													1,516,750
PMT2184		1,516,432													1,516,432
PMT2265		1,503,127	13,145												1,516,272
PMT2996		1,505,900	7,966												1,513,866
PMT1305		1,513,767													1,513,767

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PMT1345	587,252	903,213	21,733												1,512,198
PMT1812		973,792	538,016	35											1,511,843
PMT1120		1,509,190	2,076												1,511,266
PMT1169	1,195,917	308,317	2,996												1,507,230
PMT0923		1,434,435	72,410												1,506,845
PMT0384		1,506,249													1,506,249
PMT0569		1,506,165													1,506,165
PMT1534	1,504,505	861													1,505,366
PMT1768		1,494,830	10,153												1,504,983
PMT3002	1,502,612														1,502,612
PMT3247		47,017	265,011	1,187,694											1,499,722
PMT2099		1,499,544													1,499,544
PMT0810		1,484,051	11,227	3,516											1,498,794
PMT1255		787,725	519,318	190,688											1,497,731
PMT0925	186,299	1,282,085	29,177												1,497,561
PMT2836		1,496,121	55												1,496,176
PMT2717	1,496,168														1,496,168
PMT1051		1,477,747	16,760												1,494,507
PMT1946		1,493,889													1,493,889
PMT1502		1,492,700													1,492,700
PMT0687		1,171,197	319,706												1,490,903
PMT0700		1,454,709	35,883												1,490,592
PMT0395	352,971	1,136,572													1,489,543
PMT2783	10,815	1,471,597	6,160												1,488,572
PMT0817	1,488,518														1,488,518
PMT0758		1,438,345	25,223	24,898											1,488,466
PMT3264	239,616	1,111,669	134,607												1,485,892
PMT2015		1,485,757													1,485,757
PMT2455	148,111	1,329,066	8,501												1,485,678
PMT2557		1,248,604	234,340												1,482,944
PMT0163		1,481,770													1,481,770
PMT0450		1,480,757													1,480,757
PMT3148		1,479,802													1,479,802
PMT0958	228,224	1,237,877	12,759												1,478,860
PMT3244		1,474,304													1,474,304
PMT1974	1,281,526	192,213													1,473,739
PMT0438		1,472,564													1,472,564
PMT0148		839,682	632,756												1,472,438
PMT2486	864,709	601,576	5,480												1,471,765
PMT3000	32,632	1,403,920	35,174												1,471,726
PMT1681	616,765	854,299													1,471,064
PMT3093		1,409,409	60,928	9	2										1,470,348
PMT0341		1,470,274													1,470,274
PMT1215	256,073	1,214,130													1,470,203
PMT0870		1,466,662	1,046												1,467,708
PMT2407		1,466,995													1,466,995
PMT3288	593,479	865,886	5,835												1,465,200
PMT2909	99,535	1,363,840													1,463,375
PMT0176		375,550	1,086,783												1,462,333
PMT0028		1,453,850	7,645												1,461,495
PMT1301	456,977	992,373	10,486												1,459,836
PMT2791	18,724	1,314,227	126,218												1,459,169
PMT3298		1,458,455	347												1,458,802
PMT2978	50,256	1,397,947	8,424												1,456,627
PMT1820	111,133	1,345,277													1,456,410
PMT1904	1,434,470	21,140	558												1,456,168
PMT0072	934,173	503,721	17,770												1,455,664
PMT2431	1,299,046	139,611	14,374												1,453,031
PMT0627	947,771	495,592	4,329												1,447,692

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PMT1627		1,447,022													1,447,022
PMT2202	532,200	879,852	32,758	1,190											1,446,000
PMT0738	888,603	557,156													1,445,759
PMT0083	11,921	1,432,230	1,103												1,445,254
PMT1550	93	1,387,283	57,620												1,444,996
PMT2156		1,196,526	184,806	55,809	7,156										1,444,297
PMT2153	1,443,702														1,443,702
PMT1127	9,285	1,434,318													1,443,603
PMT1695	590,346	811,346	41,755												1,443,447
PMT2500	185,337	1,206,116	50,595												1,442,048
PMT2870		1,237,425	204,088												1,441,513
PMT3195		1,441,138													1,441,138
PMT2695	1,072,760	367,465													1,440,225
PMT2282		1,439,775													1,439,775
PMT1425	422,850	903,015	112,575												1,438,440
PMT2532		1,438,297													1,438,297
PMT2333		1,437,988													1,437,988
PMT2991	1,437,525														1,437,525
PMT2547	1,196,966	240,218													1,437,204
PMT0715	214,939	1,200,967	18,453	2,524											1,436,883
PMT1724		1,405,120	29,638												1,434,758
PMT2661		1,369,918	9,070	9,958	44,448										1,433,394
PMT2110	353,583	869,448	210,349												1,433,380
PMT3344		1,432,394													1,432,394
PMT2893		1,431,003	312												1,431,315
PMT0838	385,632	1,042,329	2,153												1,430,114
PMT2817		1,428,959													1,428,959
PMT1702		1,428,081													1,428,081
PMT2801		1,415,116	10,855												1,425,971
PMT0509		1,200,393	225,168												1,425,561
PMT1710		1,425,398													1,425,398
PMT1747	70,947	1,322,522	31,159												1,424,628
PMT2189		1,424,451													1,424,451
PMT3136		1,193,152	230,507												1,423,659
PMT2518		1,313,583	109,846												1,423,429
PMT1171		1,402,520	20,254	640											1,423,414
PMT3245		778,332	643,725												1,422,057
PMT0893		1,421,262	153												1,421,415
PMT2370	415,869	954,494	46,049	4,879											1,421,291
PMT1981	483,029	925,556	11,680												1,420,265
PMT0790		1,419,656													1,419,656
PMT2640		1,418,861													1,418,861
PMT2271		1,418,104													1,418,104
PMT1748		1,418,002													1,418,002
PMT1942		1,417,571													1,417,571
PMT1657		1,417,034													1,417,034
PMT0665	1,288,210	128,126													1,416,336
PMT1642	371,393	1,021,218	23,231												1,415,842
PMT2804	160,600	1,227,562	16,267	2,075	9,297										1,415,801
PMT0774		1,415,401													1,415,401
PMT2158	240,064	1,131,519	39,716	712	3,190										1,415,201
PMT1944	815,357	460,821	136,932												1,413,110
PMT0087		1,412,966													1,412,966
PMT0793	11,039	1,394,728	6,557												1,412,324
PMT0693	1,412,051														1,412,051
PMT2825	307,089	1,093,915	11,045												1,412,029
PMT2161	98,624	1,267,928	47,417												1,411,969
PMT0672		1,411,471													1,411,471
PMT1613	546,518	833,158	27,732	2,088											1,409,496

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT1363		1,409,030													1,409,030
PMT2657	148,387	1,187,910	72,699												1,408,996
PMT1489	428,923	915,632	46,450	16,959	895										1,408,859
PMT3301		1,331,059	73,896	3,009	698										1,408,662
PMT2311	261,430	1,060,725	64,720												1,406,875
PMT1062		1,297,043	109,647												1,406,690
PMT1509		1,405,894													1,405,894
PMT1821		1,405,841													1,405,841
PMT1119	389,481	1,015,970													1,405,451
PMT0154	1,065,910	336,928	1,496												1,404,334
PMT0310		1,350,876	53,410												1,404,286
PMT2576	15,195	1,380,491	8,491												1,404,177
PMT2165	250,914	1,143,350	7,550	233	1,045										1,403,092
PMT0422	1,303,950	99,096													1,403,046
PMT0017	133,282	779,956	487,081	2,388											1,402,707
PMT1030		1,400,922	1,733												1,402,655
PMT0440	98,726	1,196,925	64,941	41,115											1,401,707
PMT0948	441,983	895,778	59,790	3,089											1,400,640
PMT1212		1,400,557													1,400,557
PMT2773		1,400,025													1,400,025
PMT2135	37,415	1,361,846													1,399,261
PMT0117	600,271	790,941	3,291	4,480											1,398,983
PMT2489	916,633	481,782													1,398,415
PMT2272	1,202,487	195,851													1,398,338
PMT0002	1,397,576														1,397,576
PMT1100		1,393,792	1,635												1,395,427
PMT2367		1,362,625	31,434	987											1,395,046
PMT1579	49,967	1,312,860	31,654												1,394,481
PMT2411	1,171,209	222,434													1,393,643
PMT2005	680,899	708,808	3,386												1,393,093
PMT1786	1,388,774		3,710												1,392,484
PMT1139		1,391,030													1,391,030
PMT0866		1,346,830	42,723	22											1,389,575
PMT1382		1,389,005													1,389,005
PMT3186		1,388,982													1,388,982
PMT2480	43,175	1,287,014	51,158	1,362	6,107										1,388,816
PMT1984	19,613	1,327,000	41,319												1,387,932
PMT0957		1,005,285	265,303	116,756											1,387,344
PMT2875		1,305,176	81,436												1,386,612
PMT0894	49,944	1,335,514													1,385,458
PMT2815		1,140,740	241,921												1,382,661
PMT3050	143,759	1,139,987	77,300	21,427											1,382,473
PMT2346		1,228,753	153,415												1,382,168
PMT1859		1,334,458	31,511	15,714											1,381,683
PMT0159		997,566	383,746												1,381,312
PMT2947	1,378,620														1,378,620
PMT2273		1,377,179													1,377,179
PMT2079	86,525	1,252,600	31,715	4,943											1,375,783
PMT2268	868,764	479,802	27,141												1,375,707
PMT2175		1,375,147	39												1,375,186
PMT2974	3,694	1,367,929	515		345	2,369									1,374,852
PMT2861	92,872	1,281,485													1,374,357
PMT1282		1,372,785	143												1,372,928
PMT1693		1,372,266													1,372,266
PMT0622	133,745	1,236,287	1,806												1,371,838
PMT1141	624,497	614,977	132,131												1,371,605
PMT0837	359,762	906,600	104,576												1,370,938
PMT0743		1,370,897													1,370,897
PMT0366	1,369,881														1,369,881

Permit Number	Cards	Letters												Total
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PMT2653		1,359,083	10,010												1,369,093
PMT1472		1,368,774													1,368,774
PMT1248		1,368,419													1,368,419
PMT0708	1,006,461	351,871	1,387	6,218											1,365,937
PMT3218		1,363,165													1,363,165
PMT0947		1,362,032													1,362,032
PMT1204	42,018	1,318,139													1,360,157
PMT1795	60,020	1,286,976	12,637												1,359,633
PMT0993	2,405	1,357,039													1,359,444
PMT0498	596,404	711,920	29,879	5,721	13,804	1,071									1,358,799
PMT1805	2,471	1,134,152	221,882												1,358,505
PMT1034	316,761	925,382	115,673												1,357,816
PMT2643	439,793	914,870	2,548												1,357,211
PMT2039		1,356,918													1,356,918
PMT0707	1,335,633	20,655													1,356,288
PMT2625	1,000	1,283,042	71,181												1,355,223
PMT0336	3,047	1,349,603	2,500												1,355,150
PMT1769	1,335,090	17,886	810												1,353,786
PMT2514		1,352,615	582												1,353,197
PMT2598	709,470	611,554	3,786	15,896	12,414										1,353,120
PMT2888		1,337,993	14,905												1,352,898
PMT1842	463,110	873,449	13,792	2,293											1,352,644
PMT2808		1,350,209													1,350,209
PMT2166		699,539	316,848	330,011											1,346,398
PMT3239		1,347,668													1,347,668
PMT1799		1,346,206	888												1,347,094
PMT1266		1,343,871													1,343,871
PMT1573	192,408	1,142,402	9,044												1,343,854
PMT2105	961,356	326,329	55,799												1,343,484
PMT2354	828,250	514,123													1,342,373
PMT2003		1,341,223													1,341,223
PMT0594	139,831	1,191,556	9,752												1,341,139
PMT0548	1,338,428														1,338,428
PMT2364		1,280,758	56,517												1,337,275
PMT0344		1,335,224	1,658												1,336,882
PMT3262	1,334,431														1,334,431
PMT2754	549,790	727,369	56,503												1,333,662
PMT1548	137,892	1,187,902	7,710												1,333,504
PMT0873		1,264,918	67,543												1,332,461
PMT0574	58,210	1,256,441	16,003												1,331,654
PMT0552		1,326,723		844	3,785										1,331,352
PMT0539		1,331,027													1,331,027
PMT3102	450,188	868,249	12,425												1,330,862
PMT0219	532,654	776,052	20,339												1,329,045
PMT1652	39,712	1,188,937	100,302												1,328,951
PMT0800		1,328,198													1,328,198
PMT2806		1,326,783													1,326,783
PMT1318		1,326,712													1,326,712
PMT2936		1,056,539	269,251												1,325,790
PMT0734	41,666	1,280,329	2,862							550					1,325,407
PMT1988	5,102	1,319,662													1,324,764
PMT2295	212,752	992,117	103,254	15,974											1,324,097
PMT2108		1,323,490													1,323,490
PMT0319	1,323,392														1,323,392
PMT1182		1,322,599	339												1,322,938
PMT0252		1,322,835													1,322,835
PMT2609	336,962	971,092	8,926	4,971											1,321,951
PMT2249	66,516	1,254,422													1,320,938
PMT0516		1,320,761													1,320,761

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PMT3346	126,022	1,194,319													1,320,341
PMT0425	7,502	1,242,859	68,840												1,319,201
PMT0740		1,318,633													1,318,633
PMT1559		1,317,067													1,317,067
PMT1840	174,292	1,134,561	8,079												1,316,932
PMT0709		1,316,760													1,316,760
PMT2017	13,407	1,293,331	8,264												1,315,002
PMT0115	185,396	1,123,143	5,633												1,314,172
PMT0905	453,475	858,638													1,312,113
PMT0244		1,218,309	93,602												1,311,911
PMT3238		1,310,772													1,310,772
PMT0056	1,310,314														1,310,314
PMT2775	229,069	1,079,802													1,308,871
PMT0472		1,308,663	120												1,308,783
PMT0363	1,308,766														1,308,766
PMT0255		1,263,210	45,493												1,308,703
PMT0265	1,288,230	19,474													1,307,704
PMT0113		1,307,305													1,307,305
PMT0746		1,304,494	1,822												1,306,316
PMT1397	2,087	1,292,457	10,278												1,304,822
PMT2134	830,551	473,172	164	728											1,304,615
PMT0236		1,296,246	7,966												1,304,212
PMT2994	11,665	1,292,015	528												1,304,208
PMT3199	7,146	1,264,442	32,428												1,304,016
PMT1610	288,585	989,103	24,806	1,413											1,303,907
PMT3196	26,723	1,264,158	12,838												1,303,719
PMT2623		1,267,332	36,249												1,303,581
PMT2942		1,292,116	9,284												1,301,400
PMT2503	58,258	1,048,774	192,639												1,299,671
PMT1254	603,536	695,375													1,298,911
PMT1076		399,143	899,195												1,298,338
PMT3220		1,274,306	23,159												1,297,465
PMT1879		1,297,138													1,297,138
PMT1887		1,256,904	36,654	2,449	123	550									1,296,680
PMT2772		1,298,613													1,298,613
PMT2216	156,688	1,114,435	13,604	4,306	7,094										1,296,127
PMT3127		1,294,461	1,148												1,295,609
PMT0584		1,294,994													1,294,994
PMT1236		1,294,792													1,294,792
PMT0170	387,500	906,644			92	408									1,294,644
PMT1760		1,293,996													1,293,996
PMT0267	1,292,814														1,292,814
PMT1935		1,292,484													1,292,484
PMT2293	5,210	753,640	527,967	3,457											1,290,274
PMT0922	316,610	905,054	66,133	461											1,288,258
PMT0446	564,772	706,110	17,256												1,288,138
PMT1465	514,295	764,579	8,183												1,287,057
PMT3139	1,286,779														1,286,779
PMT1072		1,285,940													1,285,940
PMT0519	910	1,173,651	111,248												1,285,809
PMT3064	486,881	743,840	54,838												1,285,559
PMT0420		1,283,993													1,283,993
PMT3164		857,898	425,854												1,283,752
PMT0004	49,075	1,202,343	32,227												1,283,645
PMT0304	29,533	1,253,906													1,283,439
PMT0782		1,265,354	16,751												1,282,105
PMT1527		1,235,860	39,101	6,116											1,281,077
PMT2465	14,461	1,174,803	91,748												1,281,012
PMT0558	129,796	922,433	228,302												1,280,531

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PMT1111	901,265	378,071													1,279,336
PMT0692	1,440	1,277,305	371												1,279,116
PMT0690	8,157	1,270,790													1,278,947
PMT2022	2,983	1,275,356													1,278,339
PMT0521		1,277,162													1,277,162
PMT1364	500,742	733,639	35,786	1,252	5,585										1,277,004
PMT2583		1,064,516	211,394												1,275,910
PMT0038		1,275,788													1,275,788
PMT0751	158,321	1,084,037	30,103	2,241											1,274,702
PMT2406		1,274,686													1,274,686
PMT0667		572,243	701,604												1,273,847
PMT1903	295,264	978,086													1,273,350
PMT2422		726,187	546,494												1,272,681
PMT2572	1,269,792														1,269,792
PMT0650	618,724	639,006	8,882	2,349											1,268,961
PMT2123	1,268,929														1,268,929
PMT1863		1,267,932													1,267,932
PMT3289	14,968	1,252,353													1,267,321
PMT1065		602,198	660,715	4,363											1,267,276
PMT1581		1,267,211													1,267,211
PMT0413	418,843	847,397													1,266,240
PMT1320		1,264,278													1,264,278
PMT1836		1,263,843													1,263,843
PMT0299	944,314	317,417	1,500												1,263,231
PMT0195	1,094,920	167,925													1,262,845
PMT0762		878,070	383,542												1,261,612
PMT3017	459,979	721,547	79,865												1,261,391
PMT2040		1,257,765	3,016												1,260,781
PMT3078	58,304	1,180,309	22,107												1,260,720
PMT2067	1,260,582														1,260,582
PMT3263	460,813	784,018	15,211												1,260,042
PMT2828	9,496	1,247,917													1,257,413
PMT0698	248,886	1,004,947	524												1,254,357
PMT1519	811,418	427,173	14,803	482											1,253,876
PMT1704	4,065	1,248,159	1,298												1,253,522
PMT1525	2,370	1,222,819	28,160												1,253,349
PMT2037		1,252,314													1,252,314
PMT2949	1,967	1,241,502	8,810												1,252,279
PMT2142	782,447	423,086	40,326	1,150	5,139										1,252,148
PMT3307	184,961	1,063,407	3,418												1,251,786
PMT1188	1,004,854	243,754	2,197												1,250,805
PMT2827		1,095,613	154,967												1,250,580
PMT2537		1,248,797													1,248,797
PMT1843	38,927	1,205,313	3,924												1,248,164
PMT2172	814,804	433,003													1,247,807
PMT2309	38,749	1,208,529													1,247,278
PMT1674	41,814	1,205,183													1,246,997
PMT0570	119,107	1,108,501	16,121	2,552											1,246,281
PMT1939		1,245,982	63												1,246,045
PMT1332		1,132,138	113,788												1,245,926
PMT2078		1,225,687	19,472												1,245,159
PMT1709	11,794	1,224,147	8,943												1,244,884
PMT0329	191,389	1,049,128	2,537												1,243,054
PMT0119	7,035	1,223,203	859	2,161	9,692										1,242,950
PMT3135	813,329	406,375	23,189												1,242,893
PMT1634	323,006	911,284	7,358												1,241,648
PMT3309	1,113,408	128,100													1,241,508
PMT1621	14,641	1,225,426													1,240,067
PMT2807		1,239,594													1,239,594

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PMT3084		1,232,005	6,486												1,238,491
PMT3122	820,192	415,305	2,075												1,237,572
PMT1661	368,243	851,360	14,566	1,949											1,236,118
PMT0325		1,235,901													1,235,901
PMT1570	71,107	1,152,504	11,634												1,235,245
PMT2442	903,550	331,089													1,234,639
PMT1725	321	1,234,304													1,234,625
PMT0303		1,199,587	34,971												1,234,558
PMT1776	535,746	626,677	61,120	2,501	8,475										1,234,519
PMT2006	13,199	1,208,470	11,712												1,233,381
PMT1144	20,205	1,191,788	12,003	5,609	245	1,095									1,230,945
PMT1476		1,082,690	48,467	17,993	80,707										1,229,857
PMT2377	784,781	445,067													1,229,848
PMT2984		705,477	521,893	1,784											1,229,154
PMT0685	1,054,373	171,813	2,732												1,228,918
PMT2621		1,227,401													1,227,401
PMT2416		1,173,472	42,396	10,213											1,226,081
PMT2830	3,496	1,221,994													1,225,490
PMT1110	259,527	958,749	4,952												1,223,228
PMT0854	391,551	823,004	8,203												1,222,758
PMT0710		1,213,350	8,083												1,221,433
PMT2335		1,221,259													1,221,259
PMT0220	4,982	1,215,654	215												1,220,851
PMT0302		1,147,324	73,333												1,220,657
PMT2656	530,382	673,864	14,203												1,218,249
PMT2238		1,208,963	7,850												1,216,813
PMT2028		1,216,772													1,216,772
PMT1951		1,160,361	54,077	1,338	9										1,215,785
PMT0193		1,215,604													1,215,604
PMT2429		1,215,321													1,215,321
PMT2253		1,202,849	12,450												1,215,299
PMT2574		856,280	325,825	26,853	5,308										1,214,266
PMT0952	1,214,037														1,214,037
PMT1187		1,212,204													1,212,204
PMT2400		1,102,920	107,966												1,210,886
PMT3101		1,206,942	3,791												1,210,733
PMT1466	325,451	834,642	48,487												1,208,580
PMT1384		1,207,881													1,207,881
PMT1295		1,205,725	1,759												1,207,484
PMT1081	1,140,758	46,418	19,998												1,207,174
PMT1729	1,142,986	52,009	10,597												1,205,592
PMT3072	2,050	1,202,326	185	822											1,205,383
PMT2314		1,204,249													1,204,249
PMT0772		1,202,560	1,486												1,204,046
PMT1074	631,510	571,212	1,307												1,204,029
PMT2709		1,124,844	78,471												1,203,315
PMT2639	18,159	1,139,606	44,545												1,202,310
PMT2306	14,287	1,187,560													1,201,847
PMT2940		1,201,625	203												1,201,828
PMT0179	425,054	757,642	13,565	5,097											1,201,358
PMT2955		1,201,265													1,201,265
PMT1689	37,002	1,107,480	56,646												1,201,128
PMT1450	728,225	470,707	1,133	482											1,200,547
PMT2070	110,820	1,089,378													1,200,198
PMT1694	116,244	1,066,517	13,142	4,273											1,200,176
PMT1386	16,624	1,176,611	5,951												1,199,186
PMT0624	22,248	1,166,715	10,000												1,198,963
PMT2958		1,196,495													1,198,495
PMT0678	59,957	1,138,424													1,198,381

Permit Number	Cards	Letters 0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	Total
PMT2038		1,026,910	171,099	80											1,198,089
PMT0786		1,197,716													1,197,716
PMT3129		1,196,866													1,196,866
PMT1441	281,558	858,764	46,350			1,782	7,993								1,196,447
PMT2414		1,191,833	4,449												1,196,282
PMT3267		1,196,133													1,196,133
PMT1499		1,082,555	131,643					171	766						1,195,135
PMT2599	58,164	1,136,505													1,194,669
PMT1619		1,193,956													1,193,956
PMT0512	692,340	495,677	4,841												1,192,858
PMT0455		1,192,731													1,192,731
PMT3099		1,191,436													1,191,436
PMT0756	1,109,134	80,838													1,189,972
PMT1921	864,541	219,077	104,992	242	1,083										1,189,935
PMT2011		1,189,500													1,189,500
PMT2519		1,185,846	3,046												1,188,892
PMT2198		1,186,218	679												1,186,897
PMT1781	552,903	605,348	27,244	202	901										1,186,598
PMT1684	139,143	1,047,137													1,186,280
PMT1870		832,349	353,609												1,185,958
PMT0600		1,185,923													1,185,923
PMT1892	1,185,570														1,185,570
PMT0263		1,184,768													1,184,768
PMT3023	368,811	802,177	13,617												1,184,605
PMT0998	786,262	397,924													1,184,186
PMT0278		989,615	193,100	692	55										1,183,462
PMT0508	1,174,880	7,810													1,182,690
PMT2711		1,182,378													1,182,378
PMT0525		1,180,932													1,180,932
PMT2080		976,560	204,311												1,180,871
PMT0475	591,497	527,625	60,803												1,179,925
PMT1133	98,720	1,081,021													1,179,741
PMT3221		1,175,863	2,011	1,728											1,179,602
PMT1420	85,657	1,092,861													1,178,518
PMT0796	410,383	734,297	25,539	8,015											1,178,234
PMT0292		1,178,111													1,178,111
PMT2506	127,780	1,014,132	35,458												1,177,370
PMT0185	1,176,806														1,176,806
PMT1096		1,175,672	894												1,176,566
PMT2839		1,176,308													1,176,308
PMT0492	391,441	594,094	147,694	42,924											1,176,153
PMT1104		1,080,380	95,471												1,175,851
PMT0890		981,538	193,773												1,175,311
PMT3083	162,105	941,866	70,458												1,174,429
PMT2145	504,308	657,193	12,653												1,174,154
PMT2716	1,011,227	160,026	2,577												1,173,830
PMT0717	7,022	1,166,790													1,173,812
PMT3180		1,173,344													1,173,344
PMT0696		1,170,935													1,170,935
PMT0917	73,311	1,090,172	7,263												1,170,746
PMT1228	955	1,168,195													1,169,150
PMT2575	173,511	986,114	9,394												1,169,019
PMT1421		647,945	518,189	2,310											1,168,444
PMT2012	1,167,835														1,167,835
PMT1055		1,166,474	544												1,167,018
PMT1416	168,249	967,138	14,340	16,959											1,166,686
PMT0911		1,165,170	594												1,165,764
PMT1500		1,015,836	149,141												1,164,977
PMT1316		1,164,746													1,164,746

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT0634		1,164,082													1,164,082
PMT2468		1,095,634	68,235												1,163,869
PMT0682	18,455	741,672	372,946	29,402											1,162,475
PMT0745	2,765	1,159,491													1,162,256
PMT1924	10,416	1,150,073													1,160,489
PMT2783		1,097,085	63,146												1,160,231
PMT0246	1,159,304														1,159,304
PMT0750	321,834	795,279	41,779												1,158,892
PMT1176	1,158,066														1,158,066
PMT2076		1,158,036													1,158,036
PMT2041		1,157,560	4												1,157,564
PMT1908	25,778	1,131,464													1,157,242
PMT2331		1,156,050	522												1,156,572
PMT1980	500,444	655,209													1,155,653
PMT3207	106,032	862,505	186,403												1,154,940
PMT1263	309,644	841,136	3,116												1,153,896
PMT0175	1,152,314														1,152,314
PMT2128		1,152,074													1,152,074
PMT1440	309,080	785,130	50,628	7,088											1,151,926
PMT0787	1,151,693														1,151,693
PMT1090	27,381	1,102,910	20,796												1,151,087
PMT2143		1,150,266	563												1,150,829
PMT1536	275,824	728,509	140,667	3,179	2,500										1,150,679
PMT2329	577,800	557,100	14,308												1,149,208
PMT0201	694	1,148,124													1,148,818
PMT0799		1,147,721		104	465										1,148,290
PMT0080		1,146,775	1,505												1,148,280
PMT2541		1,148,036													1,148,036
PMT0260		1,145,947													1,145,947
PMT1731		1,145,409													1,145,409
PMT0053		1,134,783	10,068												1,144,851
PMT0586		1,144,005													1,144,005
PMT0502	1,142,391														1,142,391
PMT2357		1,142,188													1,142,188
PMT1304	3,992	952,367	184,717	717											1,141,793
PMT3098	5,495	1,126,686	9,187												1,141,368
PMT0780		1,140,428													1,140,428
PMT1925		796,657	341,241												1,137,898
PMT0151	1,113,184	23,680	511												1,137,375
PMT2420	1,009,465	127,142													1,136,607
PMT0357		1,136,192													1,136,192
PMT2972	114,994	1,019,928													1,134,922
PMT2497		551,683	583,085												1,134,768
PMT1482	477,847	633,467	22,710	697											1,134,721
PMT1994	5,313	1,123,928	4,007												1,133,248
PMT1644	241,268	885,145	6,260												1,132,673
PMT1252		1,132,550													1,132,550
PMT1654	340,834	692,774	98,579												1,132,187
PMT2240		1,130,032													1,130,032
PMT3079	891,989	235,433	2,175												1,129,597
PMT1488	906,708	222,541													1,129,249
PMT0803		1,128,660													1,128,660
PMT3142	78,209	1,045,399	3,600												1,127,208
PMT1467	23,556	1,026,333	77,011												1,126,900
PMT0891		1,125,398													1,125,398
PMT1546		899,167	226,156												1,125,323
PMT2956		1,083,994	40,670												1,124,664
PMT1237	840,717	273,896	9,786												1,124,399
PMT2299		1,118,645	4,887												1,123,532

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PMT2848	5,316	700,380	235,184	34,736	147,599										1,123,215
PMT2334		1,122,949													1,122,949
PMT2405	1,023,816	99,062													1,122,878
PMT1985		1,100,738	21,513												1,122,251
PMT1532		1,079,143	42,462												1,121,605
PMT0062	89,081	1,032,290													1,121,371
PMT3085	1,035,044	80,515	5,342												1,120,901
PMT1432		1,120,768													1,120,768
PMT2528		1,120,010													1,120,010
PMT2756		1,119,708													1,119,708
PMT0432		399,708	719,694												1,119,402
PMT2469		1,118,869													1,118,869
PMT2536		1,118,747													1,118,747
PMT0871		1,118,552													1,118,552
PMT0532		1,115,617	2,927												1,118,544
PMT0956	24,761	1,093,324													1,118,085
PMT2511		1,106,081	11,510												1,117,591
PMT3193		1,039,746	75,905	1,079											1,116,730
PMT0391	1,116,398														1,116,398
PMT1640		1,113,459	2,525												1,115,984
PMT2287		1,115,382													1,115,382
PMT0730	827,218	190,469	97,368												1,115,055
PMT0566		1,114,757													1,114,757
PMT1209		1,112,202	1,571												1,113,773
PMT2708		1,019,498	94,273												1,113,771
PMT1184		1,112,075													1,112,075
PMT1679	401,578	710,278													1,111,856
PMT1524	13,541	1,070,873	8,483	17,612											1,110,509
PMT0541		1,067,293	42,582												1,109,875
PMT1663		1,109,216	12												1,109,228
PMT3103		828,159	280,810												1,108,969
PMT0406	213,515	825,897	68,311	820											1,108,543
PMT1098	1,108,426														1,108,426
PMT0932	10,006	989,961	107,439	656											1,108,062
PMT0447	1,107,344														1,107,344
PMT1445		1,106,965													1,106,965
PMT1329	533,627	573,210													1,106,837
PMT3030	1,041,373	65,414													1,106,787
PMT0517	367,060	739,093													1,106,153
PMT2116		1,105,598													1,105,598
PMT0927		1,104,981													1,104,981
PMT1915		1,103,979													1,103,979
PMT0954	186,437	917,461													1,103,898
PMT1600	139,228	963,502													1,102,730
PMT0813	309,828	737,796	54,052	934											1,102,610
PMT0237		1,062,936	38,401												1,101,337
PMT2289		860,512	229,351	11,386											1,101,249
PMT3204		1,100,756													1,100,756
PMT0228		1,100,221													1,100,221
PMT2704		1,100,095													1,100,095
PMT1343	12,057	1,060,698	27,099												1,099,854
PMT0823		1,099,353													1,099,353
PMT1194		1,090,055	9,000												1,099,055
PMT0245		1,098,404													1,098,404
PMT2986		1,097,070													1,097,070
PMT3228		1,096,922													1,096,922
PMT0042		1,096,612													1,096,612
PMT3184		1,096,548													1,096,548
PMT2462	467,067	628,449													1,095,516

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PMT1232		1,085,079	9,541												1,094,620
PMT2127		1,094,463	19												1,094,482
PMT3146	426,800	649,536	17,804												1,094,140
PMT0389	116,678	976,879													1,093,557
PMT3225	1,093,381														1,093,381
PMT1357		1,090,443													1,090,443
PMT0052		1,089,801													1,089,801
PMT0093	590,434	497,913													1,088,347
PMT2472		1,077,320	10,759												1,088,079
PMT0604	144,385	938,335	3,819												1,086,539
PMT2245		1,085,397													1,085,397
PMT2735	821,806	261,422													1,083,228
PMT0478	106,188	968,476	8,484												1,083,148
PMT0005	80,347	756,664	171,130	74,509											1,082,650
PMT1890		1,081,490													1,081,490
PMT2665	362,250	705,359	13,552												1,081,161
PMT2788		1,080,875													1,080,875
PMT0192	80,182	986,322	14,132												1,080,636
PMT3024		1,080,070													1,080,070
PMT0280		1,079,059													1,079,059
PMT1562		998,262	80,379												1,078,641
PMT1856		1,078,137													1,078,137
PMT2415	1,076,607	1,283													1,077,890
PMT0177		1,077,691													1,077,691
PMT0215		1,077,150													1,077,150
PMT3073		1,075,271	331	1,483											1,077,085
PMT2829		1,076,943													1,076,943
PMT2559		1,076,455													1,076,455
PMT1538	41,182	973,222	61,234												1,075,638
PMT1749		1,073,602													1,073,602
PMT1396		1,072,933													1,072,933
PMT2644		1,071,503													1,071,503
PMT0230		1,071,293													1,071,293
PMT1614	569,087	481,240	20,731												1,071,058
PMT2906		1,070,386													1,070,386
PMT0313		1,069,288		137	612										1,070,037
PMT0719		1,068,349	1,384												1,069,733
PMT0262		1,069,579													1,069,579
PMT3249		826,006	159,727	83,288											1,069,021
PMT0889		976,443	92,299												1,068,742
PMT1979		1,068,423													1,068,423
PMT0066	349,466	718,711													1,068,177
PMT1580	517,879	501,101	48,895												1,067,875
PMT2345	211,895	855,360													1,067,255
PMT1756		1,033,510	32,642	980											1,067,132
PMT2689	124,690	876,169	65,831												1,066,690
PMT0702		1,064,372													1,064,372
PMT1131		896,886	166,038												1,062,924
PMT2971	185,769	756,230	120,767												1,062,766
PMT3257	341,994	720,723													1,062,717
PMT0939	922,831	135,898	3,844												1,062,573
PMT3154		1,062,434													1,062,434
PMT3153	442,228	611,077	8,360												1,061,665
PMT2563		1,061,507													1,061,507
PMT2348		1,060,314	441												1,060,755
PMT2951		1,059,953													1,059,953
PMT0853		1,058,108	206												1,058,314
PMT2055		1,025,719	32,470												1,058,189
PMT2856	307,566	715,059	34,212												1,056,837

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PMT2097	137,176	919,299													1,056,475
PMT0577		1,055,947													1,055,947
PMT0174	3,290	1,052,482													1,055,772
PMT0771	1,050,668	5,009													1,055,677
PMT1884		1,054,825													1,054,825
PMT1759		1,054,249													1,054,249
PMT1814	7,519	1,046,519	128												1,054,166
PMT0088		1,052,754	1,037												1,053,791
PMT0999	1,047,221	5,581													1,052,802
PMT0511	30,316	1,022,168													1,052,484
PMT0773	372,923	676,767	692												1,050,382
PMT2125	347,438	685,615	15,355	1,740											1,050,148
PMT3090	233,660	778,220	37,227	710											1,049,817
PMT0931		1,048,389	979												1,049,368
PMT1771	901,113	139,844	7,822												1,048,779
PMT2789		1,048,295													1,048,295
PMT2059	145,257	868,854	33,836												1,047,947
PMT0949	93,993	941,137	11,744												1,046,874
PMT0810	213,488	823,736	9,603												1,046,827
PMT2069	91,600	912,599	35,878	6,596											1,046,673
PMT1427		1,043,540	1,066	249	1,811										1,046,666
PMT1978		968,643	70,876	6,048											1,045,567
PMT1191	539,308	506,191													1,045,499
PMT1828		1,044,757													1,044,757
PMT2252	135,472	849,405	58,920												1,043,797
PMT1820		1,043,469													1,043,469
PMT0581		1,042,565	684												1,043,249
PMT2647		1,009,505	33,282												1,042,787
PMT2743	154,788	887,617													1,042,405
PMT0830	66,151	975,584													1,041,735
PMT3210		1,036,139	5,000												1,041,139
PMT2769	38,979	959,556	11,627	30,662											1,040,824
PMT2636		949,391	90,943												1,040,334
PMT1516	74,195	965,389													1,039,584
PMT0084	35,998	916,094	87,353												1,039,445
PMT3034	968,898	65,864	418	1,867	317	1,419									1,038,783
PMT0189	36,427	1,002,348													1,038,775
PMT2280		1,037,590													1,037,590
PMT0125	5,897	1,031,272													1,037,169
PMT1993		780,051	256,448												1,036,499
PMT0573		991,785	41,057	3,056											1,035,898
PMT0096		1,035,581													1,035,581
PMT2585		1,034,645													1,034,645
PMT0216	183,661	812,779	38,089												1,034,529
PMT1069	76,264	915,472	42,594												1,034,330
PMT1289	9,756	1,007,900	16,552												1,034,208
PMT1226	22,576	738,322	260,629	12,483											1,034,010
PMT2896	64,552	924,617	43,659												1,032,828
PMT0430		1,032,538													1,032,538
PMT1561	34,847	893,556	101,310	123	549										1,030,385
PMT0404	58,956	931,158	39,986												1,030,100
PMT0393	248,651	781,402													1,030,053
PMT1207	811,733	216,784	648												1,029,165
PMT2525		1,028,816													1,028,816
PMT0892		1,027,558													1,027,558
PMT2474	16,108	1,010,798	498												1,027,404
PMT2490		1,026,907													1,026,907
PMT1130		992,588	33,826	489											1,026,903
PMT1401	10,732	896,477	112,968	6,645											1,026,822

Permit Number	Cards	Letters												Total
		0 to 1 oz	1 to 2 oz	2 to 3 oz	3 to 4 oz	4 to 5 oz	5 to 6 oz	6 to 7 oz	7 to 8 oz	8 to 9 oz	9 to 10 oz	10 to 11 oz	11 to 12 oz	12 to 13 oz	
PMT0534		1,000,971	25,830												1,026,801
PMT0992	3,623	975,036	47,504												1,026,163
PMT3235		1,026,027													1,026,027
PMT0032	4,584	931,224	85,928	4,007											1,025,743
PMT0754		1,024,418	810												1,025,228
PMT1484		1,008,925	15,860												1,024,785
PMT2524		827,326	190,575	5,849											1,023,750
PMT0114		667,488	356,069												1,023,557
PMT1722	693,658	266,769	61,057												1,021,484
PMT0666	1,020,791														1,020,791
PMT3076		1,020,666													1,020,666
PMT0785		1,019,820													1,019,820
PMT2446		1,019,358													1,019,358
PMT1719		1,015,964	2,747												1,018,711
PMT1394	25,965	990,822	1,859												1,018,646
PMT0879		1,018,282													1,018,282
PMT2339	131,282	865,299	21,084												1,017,665
PMT0583	223,326	740,281	52,428												1,016,035
PMT2236		1,015,135													1,015,135
PMT0347		1,015,092													1,015,092
PMT0812	681,180	310,792	21,463	1,166											1,014,601
PMT0962		1,014,516													1,014,516
PMT1035		1,012,778	194												1,012,972
PMT0959	754,647	258,161													1,012,808
PMT0657	199,564	797,845	14,573												1,011,982
PMT0863		1,011,758													1,011,758
PMT0595		1,011,734													1,011,734
PMT0243		1,010,756													1,010,756
PMT1763		1,010,572													1,010,572
PMT2999	306,759	685,078	17,850												1,009,687
PMT2812	24,065	920,963	63,917												1,008,945
PMT2759	47,522	920,856	38,787												1,007,165
PMT3033	61,357	945,273													1,006,630
PMT2029	551,618	451,648	2,724												1,005,990
PMT0713	866,869	138,670													1,005,539
PMT0140	1,005,428														1,005,428
PMT2853		986,244	18,897												1,005,141
PMT2177	89,039	885,054	30,934												1,005,027
PMT1278		999,080	5,833												1,004,913
PMT0732		1,004,785													1,004,785
PMT2571		1,004,364	8												1,004,372
PMT0044		1,003,950													1,003,950
PMT0776	511,143	486,968	5,331												1,003,442
PMT1258		999,260	3,707												1,002,967
PMT0298		626,880	375,315	61											1,002,256
PMT1402		1,001,870													1,001,870
PMT1367		1,001,694													1,001,694
PMT2343		990,599	11,053												1,001,652
PMT1779	456,199	473,170	64,120	4,432	3,358										1,001,279
PMT0167		1,001,090													1,001,090
PMT3305		601,131	399,454												1,000,585
PMT2195		1,000,445													1,000,445
PMT2283		1,000,398													1,000,398

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE MAJOR MAILERS ASSOCIATION, REDIRECTED FROM WITNESS ABDIRAHMAN

MMA/USPS-T21-33. The following questions concern the Postal Service's deployment of Postal One, Phases I and II.

A. Please describe Postal One Phase I (Phase I) and Postal One Phase II (Phase II) and how each Phase is integrated into the operations of a workshare mailer and the local, regional, and national postal system. Your response should include a description of how the Postal One concept arose, whether, how, and for how long the Postal Service tested Phase I and, separately, Phase II, before they were rolled out to First-Class workshare mailers.

B. How many First-Class workshare mailers are now using (1) just Phase I, and how many are using (2) both Phase I and II?

C. Please provide all documents that describe or discuss the Postal Service's standards or guidelines regarding the conditions under which deployment of Phase I and/or Phase I and Phase II could or should be beneficial to the Postal Service.

D. Please provide all financial cost-benefit analyses produced by or for the Postal Service that are used to determine whether or not a particular mailer is a suitable candidate for (1) Phase I and (2) both Phase I and Phase II.

E. Please list and describe all factors the Postal Service considers before a recommendation is made that Phase I be implemented by a particular First-Class workshare mailer.

F. Please list and describe all factors the Postal Service considers before a recommendation is made that Phase II be implemented by a particular First-Class workshare mailer that already uses Phase I.

G. If mailer volume is one of the factors considered by the Postal Service, what minimum volume standard does the Postal Service consider necessary to justify the use of (1) Phase I and (2) both Phase I and Phase II?

H. Please provide the lowest volume and the highest volume (per month, per year, or whatever other period the Postal Service considers most relevant) that a particular First-Class workshare mailer had at the time the Postal Service recommended (1) implementation of Postal One Phase I and (2) implementation of Postal One Phase II.

I. What minimum estimated savings does the Postal Service require in order to justify recommending (1) that Phase I should be deployed by a particular mailer and (2) that Phase I and Phase II should be deployed for such a mailer?

J In FY 2004, how many First-Class workshare letters and cards were sent out by mailers who deployed (1) only Phase 1 and (2) both Phase I and Phase II? If

tray processing, reduced tray handlings, and diversion of mail from air transportation to surface transportation. In addition, other quality benefits such as enhanced tray label readability increase external and internal customer ease of use and improve service consistency. See the attached description of PostalOne! for additional information about the program and its operation.

The PostalOne! Transportation Management project began with a proof of concept undertaken by Operations Redesign in the 1996 to 1998. In August 1998, a determination was made to expand this proof of concept to additional sites as a pilot test. This expansion is Phase I.

In December 2001, following a determination that additional savings could be realized, the PostalOne! Transportation Management Phase II was approved. This is the PostalOne! Transportation Management system as it is currently operating.

B. As noted above, Phase I and Phase II are the same program under PostalOne! Transportation Management. Phase 1 was a research and development phase. The two phases do not operate concurrently. As of May 12, 2005 there are thirty-eight First-Class Mail customers participating in the program.

C. –F. The Postal Service has identified potential PostalOne! customers using a list of the largest First-Class Mail customers. A Postal Service determination to install a PostalOne! system is based on a financial analysis of the potential benefit to the Postal Service of implementing PostalOne! for that specific customer, plus the customer's assent. The financial cost-benefit analyses contain customer-specific data. To protect the commercial and privacy interests of our customers, the Postal Service does not release customer-specific data; however a general description of the factors used in the Postal Service's determination appears below and in the attached Brochure. Generally, a customer will be considered for PostalOne! if sufficient savings can be captured to justify the expense of installation. Savings are site specific and vary depending on customer mail volumes and

destinations, dispatch quality, tray label quality, Postal Service processing and transportation processes and other factors Two checklists used in the process of implementing PostalOne! are also attached. In addition, customers may elect to purchase a PostalOne! system directly from the vendor. In this case, the Postal Service will connect the system but the customer is responsible for maintenance.

G. There is no minimum volume threshold for participation in PostalOne! and a decision not to install PostalOne! has never been made based solely on the customer's mail volume. Each customer is evaluated on site specific criteria. The decision about the type of system to be deployed (automated or desktop) does depend, in part, on customer volume. Customers with large volumes can produce savings that justify the large investment of an automated system, while customers with lower volumes may produce savings that justify the smaller investment of a desktop system. Customers generally pay for installation, integration, maintenance, the cost of phone lines, power and air, and for replacement parts and labels.

H. The Postal Service cannot provide customer specific data and believes that identification of the "highest" volume could disclose customer-specific data to entities familiar with PostalOne! participating customers. During FY 2004, PostalOne! Transportation Management customers entered an average of 74,577 trays per month per customer.

I. Under the current program, the minimum estimated Postal Service return on the cost of installing the system required for PostalOne! deployment is 20.3 percent.

J. The PostalOne! program counts volume in trays not individual pieces and does not distinguish between letters and cards. In FY 2004, a total of 34,902,250 trays of First-Class Mail were entered by PostalOne! customers.

K. In FY 2006, the total Postal Service savings from PostalOne! is expected to be $6,194,735.

?ostalOne! ®
Integrated Distribution Solutions for the Mailing Community

The Postal Service has initiated a unique program designed to integrate major mailer processes with USPS Acceptance, Verification, Sorting, and Transporting processes. This program, called *PostalOne!*, is the result of extensive planning, coordination and testing by the Postal Service and participating customers. Through *PostalOne!*, significant investments have been made to better understand customer mail preparation and ?roduction processes, so that the ?ostal Service might better align its systems to achieve improved mail collection, induction and delivery.

PostalOne! is an outgrowth of the USPS Transformation Plan, Significant focus within the Transformation Plan is the need for customers (Mailers) and their suppliers (USPS) to more closely manage the processes that link the two business concerns. *PostalOne!* is designed to meet this obligation by creating a formal program within which the Postal Service and the mailing community can work in partnership to increase the level of understanding of each others processes and needs while creating an awareness of how these processes impact business concerns. By leveraging the ?ailing data created as a ?product within mailer ?roduction systems, the Postal Service can more expeditiously plan and route mail volume in the most efficient means possible and in many cases provide for in-line verification. Such a solution requires the development of alternative collection schemes, quality-based acceptance and verification procedures, and alternative transportation options to meet the needs of the mailer, which cannot be accomplished without the management of the USPS/Mailer interface.

The ultimate goal of *PostalOne!* is to make significant quality improvements to reduce mail-staging time, reduce preparation and production costs, increase mailer production throughput, and improve overall customer service. These objectives can be accomplished by aligning customer production processes and Postal Service accepting, collecting and inducting processes thereby creating an integrated distribution solution at the origin. When large volume mailers place unscheduled demands on the Postal Service distribution network, delays and the occurrence of mail misrouting increase. This creates additional cost and rework for the mailer and the Postal Service. *PostalOne!* ® focuses on planning, implementing and controlling the efficient and cost effective flow of mailer volume from their production facilities through the Postal Service system.

Given the early success of ?stalOne! ®, the Postal Service expanding the program to other major mailers whose mailing volume, production systems and mailing profile are consistent with program objectives. To be considered for this program, mailers must maintain quality systems and processes that can be aligned with those of the Postal Service. The mailer must also be willing to provide the Postal Service access to production facilities for review and process mapping, process and systems documentation, and details of mailer quality control programs and corresponding performance data. In exchange, mailers can expect reduced operating costs and improved service.

Areas of Mailer/Postal Service Integration

There are four critical areas that have to be aligned between the Postal Service and participating mailers to achieve the benefits of *PostalOne!* ®. The critical areas and elements that must be considered when developing a Mailer/Postal Service solutions are depicted in Figure 1 and further explained in the following text.

1. Production Systems - Mailer information systems, automation levels, shop floor control, and production scheduling must be considered. Unique tray identifiers that are machine-readable and can correspond to the production system data is a strong enabler. Electronic Data Interchange capabilities and limitations will determine level of integration possible to support electronic manifest systems, verification, payment and accounting systems. A demonstrable commitment to quality production as evidenced by adherence to production processes, tracking of quality defects, and resulting in clean mail volumes is an area of focus and lead to recommendations in *Acceptance/Verification*;

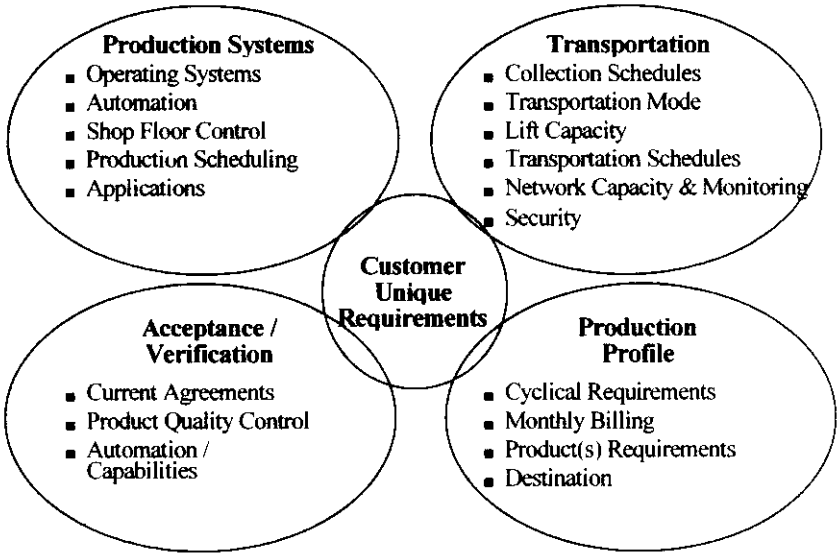

Figure 1

2. Acceptance/Verification - Mailer quality control systems and procedures coupled with the level of automation/ mechanization capabilities are of special interest. Existing agreements and arrangements between the mailer and the Postal Service combined with historical mailing defect types and frequencies provide the basis for supporting quality control changes and areas needing special attention. Acceptance/Verification procedures will be structured to meet the needs of the mailer's *Production Profile*;

3. Production Profiling - Mailer cyclical requirements, monthly billing cycles, product requirements and destination densities need to be understood. Understanding the distribution requirements of mailer volumes allows for proper scheduling and route design for mailer volumes. With notification, *Transportation* and other resource demands to accommodate new mailing requirements and new destinations (e.g., international) can be designed and scheduled;

4. Transportation - Based on the preceding three considerations, a more effective level of integration can be achieved between mailer and Postal Service transportation and information networks.

How *PostalOne!* ® Works

A Postal Service team including personnel from the mailer's servicing mail activity and USPS Headquarters will be assembled to work with each mailer. This

team, in cooperation with mailer representatives, will work in a collaborative fashion to customize a *PostalOne!* solution based on the unique needs of the mailer and the capacity of the Postal Service. This team will fully explore the four key elements, which drive the integrated solution and develop options and alternatives that balance the current customer needs with emerging mailing requirements. This process is accomplished in six simple steps.

1. Data Collection
2. Requirements Definition
3. Concept Development and Selection
4. Solution Design
5. Implementation
6. Support.

Data Collection: Mailers and USPS personnel from the servicing Postal facility will be asked to answer a survey focused on each of the four critical areas outlined above. This data will be used as the basis for requirements definition.

Requirements Definition: Using the information generated through analysis of step one data, the current and emerging business needs of the mailer are documented.

Concept Development and Selection: Mailing systems options with varying degrees of automation, mechanization, logistics, and systems integration are proposed. A cost/technical trade off analysis is conducted for each option with corresponding acceptance/verification procedures outlined.

Production System Capability Model

	GROUP A	GROUP B	GROUP C
Production (Shifts/Days per week)	3/6+	3/5	2/5
PreSort Capabilities	Electronic	Electronic	Mechanical (BCS/MLOCR)
Capable of presorting to custom dispatch routing and scheduling?	YES	NO	NO
Mechanization of Production	HIGH	MEDIUM	LOW
Acceptance/Verification	Optional Procedures and/or Manifest	Manifests	Multiple Manifests
Collections/Drops per day	Multiple	Mid-Day to Late Night	Late Afternoon/Night only
Level of Dispatch Sort	High	Medium	Low
Frequency of Mail Defects Needing Correction Prior to Induction	Rare	Seldom	Often
Number of FCM Products	Single	Few	Multiple

Solution Design: Depending on the complexity of the chosen option, solution design can be as simple as a modification to an existing mailing agreement or as complex as the development of production system requirements and selection hardware and software vendors.

Implementation: The *PostalOne!* team works in collaboration with the mailer and the mailer's support contractors in ensuring that the needs of the mailer outlined in the requirements definition step is fully incorporated in the design solution. This is a key component to *PostalOne!* success as new agreements between the mailer and Postal Service will critically detail the actions and activities of both parties beyond the implementation.

Support: Postal Service support of the newly deployed solution will be provided by local Postal Service personnel as outlined in the new agreement. The original manufacturer or vendor under contract will generally provide hardware and software support services with the mailer. Details of these matters will be outlined in the mailing agreement.

The Postal Service has developed a production system capability model (Figure I) that generally identifies the level of sophistication and complexity of major mailer production environments. This model supports rapid feasibility assessment of joint USPS/Mailer collaboration and the level of commitment that may be required to achieve new levels of integration.

Benefits to Mailers

There are many direct benefits to the Mailer as a result of this program. These benefits generally revolve around supplier management and customer care.

Proper alignment of customer production and Postal Service distribution may allow mailer production capacity to increase within existing facilities. This eliminates the need for capital expansion beyond the existing footprint by increasing throughput and collection. As the Postal Service develops future tracking and electronic information capabilities, the level of mailer integration with Postal Service systems and processes may also enable such value added features as: track and trace of FCM trays to the destinating facility; electronic payment of postage versus trust account management; production planning based on transportation availability or origin/destination density analyses; and custom logistics planning based on unique mailer needs and route requirements. Finally, improved reliability of mailer volume delivery to the mutual customer increases the ability of the mailer's customer care personnel to more effectively resolve lost notifications and delinquent remittances while simultaneously improving the relationship with the customer.

By gaining a greater understanding of its customer's business and mailing requirements, the Postal Service will be able to offer more responsive, consistent service with greater ease of access. Additionally, the Postal Service can better handle the fluctuations in volume demands at the origin area if they are linked to the mailer's planning and control processes. Responding in such a fashion allows the Postal Service to provide better, more cost effective service to this large volume customer base. *PostalOne!* focuses on planning, implementing and controlling the efficient and cost effective flow of customer volumes from their production facilities and through the USPS system to the mutual customer—the mail recipient.

In this, each member brings to the table the resources and capabilities needed to align our equipment, information technologies, operations and cultures to make significant quality cost and operational improvements. While initial investments may be substantial, the benefits accrue from Day 0.

How Do Customers Get Started?

This package has been sent to a select large volume First Class Mailers during the initial phase of the *PostalOne!* deployment. Working with this select group, solutions for each mailer based on the mailer's production environment and commitment to mail quality can be rapidly developed and deployed.

Attachment 1 to Response to MMA/USPS-T21-33

PostalOne! Automated Shipping System Deployment Checklist

Event	Lead	Complete
Site Preparation		
Local Support		
Conduct initial USPS local visit / review, including Site Deployment Toolkit overview	PO! Manager / PO! Coordinator	
Collect data before deployment	PO! Manager / PO! Coordinator	
Review mailer QC procedures	PO! Coordinator	
Provide S-AMS LAN / PRN drop	AMC	
Obtain IP Address	AMC	
Obtain DNS Name	AMC	
Provide analog phone line at AMC	AMC	
Coordinate number of breakdowns / separations with mailer	Local/PO!	
Develop S-AMS Distribution Table	S-AMS Coordinator	
Transportation Table Development (as necessary)		
Develop surface table	PO! Coordinator	
Develop schedule table	PO! Coordinator	
Test surface table	PO! Coordinator	
Mailer Support		
Conduct initial mailer site visit / review	PO! Manager / PO! Coordinator	
Provide a suitably protected and environmentally safe area for the *PostalOne!* system	Mailer	
Provide area which is integrated with Conveyance System	Mailer	
Provide Reject Line and Take Away Conveyers	Mailer	
Provide 220v power supply	Mailer	
Provide analog phone lines (2 per system – 1 for S-AMS, 1 for data logger)	Mailer	
System Deployment		
Install PostalOne! system		
Install hardware with Automated Shipping System software (v4.1), DAT, PCAnywhere, and other required software	PO! Coordinator/ Carter Controls	
Install TC	Lockheed Martin	
Software Setup and Integration		
Install surface table and schedule table (as necessary)	PO! Coordinator	
Program STARSHIP ground delays and distribution table in the TC	AMC / S-AMS Coordinator	
Process Changes (as necessary)		
Change MVS collection schedule	Local	
Revise DMU acceptance process	Local	
Revise mailer tray handling procedures	Local	
Certification Testing		
Perform Mailer Certification Testing	NCSC	
Closeout		
Review performance metrics with mailer and local office	PO! Coordinator	
Out brief mailer and local office	PO! Coordinator	
Training		
Maintenance Training	Carter Controls	
Operator Training	Carter Controls	

Attachment 2 to Response to MMA/USPS-T21-33

PostalOne! Desktop Shipping System Deployment Checklist

Event	Lead	Complete
Site Preparation		
Local Support		
Conduct initial USPS local visit / review, including Site Deployment Toolkit overview	PO! Manager / PO! Coordinator	
Collect data before deployment	Local / PO! Coordinator	
Review mailer QC procedures	Local / PO! Coordinator	
Provide S-AMS LAN / PRN drop	AMC	
Obtain IP Address	AMC	
Obtain DNS Name	AMC	
Provide analog phone line at AMC	AMC	
Coordinate number of breakdowns / separations with mailer	Local / PO! Coordinator	
Develop S-AMS Distribution Table	S-AMS Coordinator	
Transportation Table Development (as necessary)		
Develop surface table	PO! Coordinator	
Develop schedule table	PO! Coordinator	
Test surface table	PO! Coordinator	
Mailer Support		
Conduct initial mailer site visit / review	PO! Manager / PO! Coordinator	
Provide a suitably protected and environmentally safe area for the *PostalOne!* system	Mailer	
Provide an office table on which to mount the system. The table should be a minimum of 4' X 2½' or 10 ft^2	Mailer	
Provide 110 volt power supply	Mailer	
Provide analog phone lines (2 per system - 1 for S-AMS, 1 for data logger)	Mailer	
System Deployment		
Install PostalOne system		
Install hardware with Desktop Shipping System software (v4.1), DAT, PCAnywhere, and other required software	Lockheed Martin	
Install TC	AMC / Vendor	
Software Setup and Integration		
Install surface table and schedule table (as necessary)	PO! Coordinator	
Program STARSHIP ground delays and distribution table in the TC	AMC	
Process Changes (as necessary)		
Change MVS collection schedule	Local	
Revise DMU acceptance process	Local	
Revise mailer tray handling procedures	Local	
Certification Testing		
Perform Mailer Certification Testing	NCSC	
Closeout		
Review performance metrics with mailer and local office	PO! Coordinator	
Out brief mailer and local office	PO! Coordinator	
Training		
Maintenance Training	PO! Coordinator	
Operator Training	PO! Coordinator	

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE MAJOR MAILERS ASSOCIATION, REDIRECTED FROM WITNESS ABDIRHMAN

MMA/USPS-T21-42

In your response to Interrogatory MMA/USPS-T21-1A, you state that the "1SUPP_F1" cost pool has been classified as "worksharing related fixed" in USPS-LR-K-48, in order to be consistent with the Commission's treatment of such costs in Docket No. R 2000-1.

C. Please explain why, in USPS-LR-K-110, you did not follow the Commission's classification of cost pools "MODS 48, LD48 OTH" and "MODS 48, LD48-ADM" as "worksharing related fixed"?

Response:

In Docket No. R2000-1, the Commission treated LD48 cost pools as non-worksharing related fixed. In the instant proceeding, USPS-LR-K-110 is consistent with the Commission's treatment of such costs in R2000-1.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF MAJOR MAILERS ASSOCIATION,
REDIRECTED FROM WITNESS CUTTING

MMA/USPS-T26-1. In Table 1 on page 4 of your testimony, you indicate that First-Class presorted letters incur $28.911 million in window service costs.

(c) Explain what specific functions window service clerks perform that causes costs to be attributed to First-Class worksharе letters.
(d) Please provide all documents and other information you relied upon in reaching your conclusion that First-Class presort letters incur window service costs.

RESPONSE:

(c) *In addition to accepting and rating mail, window clerks perform activities that may* involve all classes and subclasses of mail. Those activities include responding to customer inquiries; delivery-related activities involving customer hold mail, caller service, non-boxholder firms, and general delivery; and selling stamps of all varieties (including precanceled stamps) and setting postage meters. For more details on the activities of window clerks, see USPS-LR-K-1, *Summary Description of USPS Development of Costs by Segments and Components, FY 2004*, Section 3.2. Overall, the amount of base year window service costs attributed to First-Class Presort is $21.235 million, which is less than 2 percent of all volume variable window service costs.

(d) Please see USPS-LR-K-1, *Summary Description of USPS Development of Costs by Segments and Components, FY 2004,* Section 3.2 (document CS03.2-04.doc).

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-1. Please use data from the instant rate proceeding to update the following figures used by witness Dauer, in USPS-T-1, Docket No. MC2005-2 :

a. Appendix A, page 1, line 3: "USPS FCM average return rates" = 1.23 percent
b. Appendix A, page 1, line 5, column 1: "Manual Letter Returns Unit Cost" = 57 cents in Year 1. (Also specify which fiscal year is "Year 1").
c. Appendix A, page 1, line 5, column 2: "Manual Letter Returns Unit Cost" = 60 cents in Year 2.
d. Appendix A, page 1, line 5 column 3: "Manual Letter Returns Unit Cost" = 62 cents in Year 3.
e. Appendix A, page 1, line 6, column 1: "Electronic Letter Returns Unit Cost" = 36 cents in Year 1.
f. Appendix A, page 1, line 6, column 2: "Electronic Letter Returns Unit Cost" = 37 cents in Year 2.
g. Appendix A, page 1, line 6, column 3: "Electronic Letter Returns Unit Cost" = 39 cents in Year 3.

RESPONSE:

This question requests information on a subset of the figures used by witness Dauer in the HSBC case. Because it only a subset of the figures used, no assumptions should be made regarding effects on the NSA as a whole.

a. The 1.23 percent figure has not changed in this case.

b. Year 1 for the NSA is FY 2005, and no new Manual Letter Returns Unit Cost estimate has been developed for FY 2005.

c. Year 2 for the NSA is FY 2006. For this rate case, the USPS version Manual Letter Returns Unit Cost for the Test Year (FY 2006) is estimated at 48.4 cents.

d. Year 3 for the NSA is FY 2007, which is beyond the Test Year for which costs have been developed for this docket.

e. Year 1 for the NSA is FY 2005, and no new Electronic Letter Returns Unit Cost estimate has been developed for FY 2005.

f. Year 2 for the NSA is FY 2006. For this rate case, the USPS version Electronic Letter Returns Unit Cost for the Test Year (FY 2006) is estimated at 31.0 cents.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

g. Year 3 for the NSA is FY 2007, which is beyond the Test Year for which costs have been developed for this docket.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-2. Postmaster General Potter made the Keynote Address at the 2005 Nashville Postal Forum on March 21, 2005. He announced, as a goal for an extended Transformation Plan, that: "In the near term . . . . I also want us to cut by 50 percent the amount of undeliverable as addressed (UAA) mail." (See http://www.usps.com/communications/news/speeches/2005/sp05_0321pmg.htm)

a. Please give a qualitative description of the effects of a 50 percent reduction in UAA mail on NSAs that are functionally equivalent to the Capital One NSA.

b. Isn't it correct that steps taken to reduce the average amount of UAA mail are likely to reduce the total amount of savings that can be achieved in NSA agreements that are functionally equivalent to the Capital One NSA? Please explain any negative answer.

RESPONSE:

a. In potential NSAs likely to be considered functionally equivalent to the Capital One NSA, the primary factors driving the opportunity for ACS savings are the amount of First-Class Mail the NSA partner deposits which is likely to be returned, and the cost savings that can be expected from converting those returned pieces from manual to electronic handling. Thus, for a specific NSA partner, one question becomes, would an overall 50 percent reduction in UAA mail be likely to reduce the amount of mail that NSA partner deposits which is likely to be returned? If the 50 percent reduction is achieved by virtue of changes in the mailing practices of other mailers, the answer might be that no reduction would necessarily be expected in the return rate for that particular NSA partner of interest. Similarly, if the unit cost savings stay the same for returned pieces converting from manual to electronic handling, the possibility of fewer returned pieces emanating from other mailers may not affect the overall costs savings applicable to the NSA partner of interest. Alternatively, if the steps taken to reduce the average amount of UAA mail would tend to reduce the likely return volume of the NSA partner, then the pool of potential ACS savings applicable to that partner would be reduced.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

b. As suggested in response to the first part of this question, it depends on whether the reduction in UAA mail is spread evenly over all mailers, including the potential NSA partners, or is focused in segments of the mailing community other than those in which the NSA partners are concentrated.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OCA

OCA/USPS-3. The following interrogatory refers to USPS-LR-93, "PRC Version/Base Year 2004 CRA Model, Data Files, and Reports (CD-ROM)."

a. The EXCEL spreadsheets found in the subdirectory, "Spreadsheets," provide data for cost segments: 01, 02, 03, 03-4, 04, 06&07, 8, 10, 12, 13, 14, 16, 20 and for I_FORMS.

(i) For each of the cost segment data elements, please (1) provide the derivation of each calculated value other than subtotals and totals, (2) cite all source documents for each element, and (3) provide copies of those documents not previously submitted in this docket.

(ii) For each data element in the I_Form.xls file, please (1) provide the derivation of each calculated value other than subtotals and totals, (2) cite all source documents for each element, and (3) provide copies of those documents not previously submitted in this docket.

RESPONSE:

a. (i) To determine the derivation of each calculated cost segment data element in the spreadsheets referenced, click on the element of interest with the computer's mouse. In the upper left corner of Excel, the calculation is shown. Another way to determine the derivation of each calculated cost segment data element is to scroll up to the column heading associated with the data element of interest. There is a notation of the source or other notes to aid in determining the calculation that was performed for the elements in the column as well as the sources used.

(ii) Similar to the cost segment data elements asked for in OCA/USPS-3 a(i), the derivation of the calculated data elements in I_Form.xls file can be determined by clicking on the element of interest with the computer's mouse. Excel displays the calculation in the upper left corner of the screen. Also at the top of each column is a notation of the source or calculation used to aid the analyst in determining the

calculation that was performed. On some spreadsheets, the source is shown on the column titled "Reference." Many of the source documents were provided in this proceeding. Others were provided in previous proceedings. The source note or "Reference" indicates the proceeding.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-4

Please refer to the response of witness Bradley to interrogatory OCA/USPS-T14-1.a.i. He states, "To my knowledge no data exists on number of bundles actually carried by individual carriers on a daily basis."

a. Does the Postal Service collect data "on number of bundles actually carried by individual carriers on a daily basis"? If so, please (1) describe the data and (2) provide that data for the days and routes in witness Bradley's analysis.

b. Does the Postal Service collect data "on number of bundles actually carried by individual carriers on a daily basis" during route evaluations? If so, please (1) describe the data and (2) provide that data for the days and routes in witness Bradley's analysis.

c. Does the Postal Service collect data on number of bundles taken to the street by individual carriers on a daily basis? If so, please (1) describe the data and (2) provide that data for the days and routes in witness Bradley's analysis.

d. Does the Postal Service collect data on number of sequenced bundles taken to the street by individual carriers on a daily basis? If so, please (1) describe the data and (2) provide that data for the days and routes in witness Bradley's analysis.

e. Does the Postal Service collect data on number of bundles taken to the street by individual carriers on a basis other than daily? If so, please (1) describe the data and (2) provide that data for the routes in witness Bradley's analysis for a time period as close as possible to the dates of data collection for the Bradley analysis.

f. Does the Postal Service at any management level record the dates when a given sequenced mailing is actually delivered on a particular route? If so, please (1) describe the process for recording the data and (2) provide that data for the days and routes in witness Bradley's analysis.

Response

a, c - e. The Postal Service does not record the number of bundles carriers take

to the street.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

b. During Mail Count and Route Inspection procedures, route examiners record the volume of mail carriers deliver, but do not collect data on the number of bundles carriers take to the street.

f. ADVANCE is a national system the Postal Service uses to record and track the actual delivery dates for specified mailings but field offices provide the ADVANCE data at the delivery unit level, rather than the route level.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-5
Do any postal employees receive training in the use or maintenance of DOIS? If so, please describe the training and provide (1) copies of training materials and (2) copies of Postal Service documents referred to in the training materials.

Response

The Postal Service provides interactive WEB-based DOIS training for delivery supervisors and managers. Because the training is on-line, there are no hard copy training materials.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-6.
Please refer to the response of witness Bradley to interrogatory OCA/USPS-T14-3.c. He states, "'Route miles' . . . were not collected in the City Carrier Street Time Study . . . ."

a. Do carriers travel a specified line of travel when performing the delivery function for letters, flats, sequenced mail and small parcels? If not, under what circumstances would a carrier deviate from the authorized line of travel to deliver letters, flats, sequenced mail, or small parcels?

b. Is the length of the authorized line of travel for the routes in witness Bradley's analysis known or recorded at any management level in the Postal Service? If so, please provide the lengths by route identifier.

Response

a. Assuming no other intervening factors, carriers are expected to follow the authorized line of travel from the office to the route, through their delivery assignment, and when returning from the route to the office. Please see the direct testimony of witness Lewis, USPS-T-30, page 10, lines 3 through 9. The list of potential intervening factors, however, can be quite extensive. A few examples include the delivery of accountables or large packages that cannot fit in the mail receptacles; hand offs of segments of the route to another carrier on heavy days; receiving hand-offs from other carriers on light days; the construction of a fence that does not allow the carrier to cut across a lawn; a detour forced by road construction; a menacing dog in the line of travel; interaction with a customer; etc.

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OCA**

b. Each motorized city delivery route has a specified authorized mileage. Without waiving its objection, the Postal Service is endeavoring to ascertain whether reasonable means exist to obtain the route length data corresponding to the routes in Prof. Bradley's analysis, given that three years have elapsed since the data used in his study were collected.

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-7. *The Postal Service filed Library Reference K-82 consisting of* ODIS-RPW reports for the 4 quarters of FY2004 on April 8, 2005, as part of the Docket No. R2005-1 filing.

* * * * *

d. Please provide the date that the ODIS-RPW systems were first merged.

* * * * *

i. Please provide ODIS or ODIS-RPW reports for Quarters 1 and 2 of FY2005. Please provide Quarter 3 and 4 reports for FY2005 immediately after they are prepared. File them as Library References in the current rate case or under the periodic reporting rule.

RESPONSE:

d. The ODIS and RPW systems were merged beginning October 1, 2003, or Postal Service Quarter 1, FY2004. Ratemaking Chief Council Daniel J. Foucheaux, Jr. first notified the Hon. Steven W. Williams, Secretary, Postal Rate Commission, about this change in a letter dated July 17, 2003. Subsequently, Mr. Williams requested a public presentation on the ODIS-RPW merger in a letter dated July 30, 2003. In September 2003, a detailed and well received presentation on the merger in the Commission's hearing room addressed the history and background of ODIS and RPW, the rationale for the merger, changes to respective systems that facilitated the merger, and how the merged system was tested and implemented,

i. Quarterly Statistics Reports for the first and second quarters of FY2005 are attached.

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-8. Please confirm that Christensen Associates has performed a study on UAA mail and address quality that was to be completed by the end of 2004. If this statement is not confirmed, then please supply the information needed to make the statement correct.

a. Please provide any information generated by this study (even if only preliminary) on the costs to the Postal Service of defective addresses on mail.

b. Please provide any information generated by this study (even if only preliminary) on the costs to the Postal Service of mail that is undeliverable as addressed because the addressee has moved.

RESPONSE:

Confirmed. Although the data collection phase has been completed, the raw data have not been reviewed, confirmed for accuracy, or otherwise analyzed, so the requested cost information is not yet available.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-9. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n), which states, in part, "This rule required identification of any performance goals which have been established for the classes and subclasses of mail," and the chart entitled "United States Postal Service Service Standards." Please explain how the Service Standards chart represents the "performance goals" required to be identified by Rule 54(n) for the classes of mail listed.

RESPONSE:

In a general sense, the service standards reflect the performance goals that the Postal

Service strives to achieve for mail, depending on its subclass, origin and destination.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-10. Please refer to Attachment F to the Request, page 35, and the chart entitled "United States Postal Service Service Standards."

(a) Please define the terms "Overnight" and "2nd Day" as used in the chart.
(b) Please confirm that the "Service Standards" in the chart for Express Mail "Overnight" service is found at DMM §113.4.2, January 6, 2005. If you do not confirm, please explain.
(c) Please confirm that the "Service Standards" in the chart for Express Mail "2nd Day" service is found at DMM §113.4.3, January 6, 2005. If you do not confirm, please explain.

RESPONSE:

(a) "Overnight" means delivery on the first scheduled delivery day after the acceptance date, excluding Sundays and holidays. "2nd Day" means delivery on the second scheduled delivery day after the acceptance date, excluding Sundays and holidays. The Sunday/holiday exclusion does not apply to certain Express Mail pieces.

(b) Confirmed that DMM § 113.4.2 describes Express Mail Next Day Service.

(c) Confirmed that DMM § 113.4.3 describes Express Mail Second Day Service.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-11. Please refer to Attachment F to the Request, page 35, and the text of Rule 54: (n), which states, in part, "The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set." Also please refer to the paragraph at the bottom of page 35, where it refers to "[a]chieved levels of performance."

a. Please confirm that the Origin-Destination Information System (ODIS) Quarterly Statistics Reports cited and filed with the Commission as LR-K-82 do not provide any data on the achieved levels of performance with respect to the Overnight and 2nd Day service standards for Express Mail. If you do not confirm, please explain.

b. Please confirm that the ODIS Quarterly Statistics Reports are not intended or designed to provide data on the achieved levels of performance with respect to the Overnight and 2nd Day service standards for Express Mail. If you do not confirm, please explain. If you do confirm, please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the Overnight and 2nd Day service standards for Express Mail.

c. If data on the achieved levels of performance with respect to the Overnight and 2nd Day service standards for Express Mail is not included in the Request, please provide the requested data.

RESPONSE:

a. Confirmed.

b-c. Confirmed that the ODIS Quarterly Statistics Reports do not address levels of achieved performance for overnight and second day Express Mail. See the response to DFC/USPS-6.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-12. Please refer to Attachment F to the Request, page 35, the "Notes" column for Express Mail in the chart entitled "United States Postal Service Standards," and the Domestic Mail Manual (DMM) §113.4.2.2, January 6, 2005, which refers to an "Express Mail Next Day Service directory" as being available at local post offices.

(a) Please confirm that the directories contain ZIP Codes for which Next Day service is provided from the ZIP Code of the local post offices in which the directories are available. If you do not confirm, please explain.

(b) Please confirm that all Next Day delivery ZIP Code pairs, i.e., ZIP Codes to which Next Day service is provided from the ZIP Codes of all local post offices (or other offices of entry), exist at the Postal Service as a data base. If you do confirm, please describe the size and format of the data base. If you do not confirm, please explain.

(c) Please describe the decision-making process by which Express Mail Next Day delivery ZIP Code pairs are changed into Second Day Service, and vice versa. For changes from Express Mail Next Day to Second Day service, and vice versa, please explain how often such changes take place on an annual basis, and the number of ZIP Code pairs changed in the last three years.

RESPONSE:

(a) Confirmed. As stated in Domestic Mail Manual (DMM) §113.4.2.2, "An Express Mail Next Day Service Directory, showing detailed local information about Express Mail Next Day Service, is available at post offices".

(b) Confirmed that a database with delivery ZIP Code pairs for Next Day service exists; however, the exact size of the database is unknown. The format for the database includes information on the cutoff time for mail acceptance for Next Day Service, the ZIP Codes eligible for Next Day Service, destinating office open/close schedule, and destinating office Sunday/holiday delivery.

(c) Changes to the network are approved by the Express Mail Change Control Board (EMCCB). Administratively this is accomplished by using the following

review process. First, the district manager will recommend the change to the Express Mail network to the area office. At the area office, the Distribution Networks Manager, the Marketing Manager, and the Operations Support Manager review, as a group, the recommended change from the district and, if approved, forward the recommendation to the EMCCB. At the Headquarters level, the EMCCB convenes to review and either approve or disapprove the requested changes to the network. The EMCCB has the responsibility for reviewing and deciding whether to implement the change to the network, determining when the Express Mail directories will be updated to reflect the change, and establishing the standard operating procedures for this process. The EMCCB advises the Chief Operating Officer and the Chief Marketing Officer through the Senior Vice President of Operations of any planned changes and their impact on service, revenue, and expenses. The EMCCB reviews recommendations five times a fiscal year.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-13. Please refer to Docket No. C2005-1, Answer of United States Postal Service, filed May 5, 2005.

(a) Please confirm that the Postal Service delivers Express Mail on the"2nd Delivery Day." If you do not confirm, please explain.

(b) Please confirm that the "2nd Delivery Day" may be three or more calendar days after the date of entry of an Express Mail piece. If you do not confirm, please explain.

(c) What percent of Express Mail is delivered on the "2nd Delivery Day?"

RESPONSE:

(a) Confirmed that Express Mail may be scheduled for delivery on the second delivery day after acceptance. There is, however, no distinct "2nd Delivery Day" Express Mail service.

(b) Confirmed that the second delivery day after acceptance may be three or more calendar days after the date of entry.

(c) The Postal Service's current measurement system, the Product Tracking System (PTS), does not collect data on Express Mail delivered on the "2nd Delivery Day." Instead, PTS collects data on the scheduled delivery date/time and the date/time delivery was made or attempted. Since Express Mail is a guaranteed service, the focus of Express Mail data collection with respect to PTS is on whether the piece arrived within the guaranteed time. On a related note, mailpieces with standards for 2-Day Service accounted for 18.5 percent of the total Express Mail volume in FY 2004.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-14. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning "identification of any performance goals," and the chart entitled "United States Postal Service Service Standards."

(a) Please identify and describe the performance goals and/or service standards for Overnight, 2nd Day, and 3rd Day Priority Mail service.

(b) Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

RESPONSE:

(a) As the chart on page 35 of Attachment F to the Request indicates, Priority Mail has a service standard that can be overnight, 2nd day, or 3rd day. For an origin-destination pair of 3 digit Zip Codes that has an overnight service standard, Priority Mail that is accepted by the applicable time in the origin postal facility should be delivered overnight. For an origin-destination pair that has a 2nd day service standard, Priority Mail that is accepted by the applicable time in the origin postal facility should be delivered by the second day. For an origin-destination pair that has a 3rd day service standard, Priority Mail that is accepted by the applicable time in the origin postal facility should be delivered by the third day.

(b) For a Postal Service document supporting the response to subpart a, please see page 35 of Attachment F to the request. United States Postal Service Service Standards software is encompassed on a CD-ROM that contains postal service standards for, inter alia, Priority Mail. Free copies of this CD are available from the National Customer Support Center.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-15. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n), which states, in part, "The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set." Also please refer to the paragraph at the bottom of page 35, where it refers to "[a]chieved levels of performance."

a. Please confirm that the ODIS Quarterly Statistics Reports cited and filed with the Commission as LR-K-82 do not provide any data on the achieved levels of performance with respect to the Overnight, 2nd Day, and 3rd Day service standards for Priority Mail. If you do not confirm, please explain how the ODIS data relate to the achieved levels of performance for Priority Mail, and to the Priority Mail service standards referred to in response to interrogatory OCA/USPS-13, above. If you do confirm, please provide data on the achieved levels of performance with respect to the Overnight, 2nd Day and 3rd Day service standards for Priority Mail.

b. Please confirm that the ODIS Quarterly Statistics Reports are not intended or designed to provide data on the achieved levels of performance with respect to the Overnight, 2nd Day and 3rd Day service standards for Priority Mail. If you do not confirm, please explain.

c. Please explain how the Postal Service uses ODIS data to improve Priority Mail so as to achieve the Priority Mail service standards.

d. Please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the Overnight, 2nd Day and 3rd Day service standards for Priority Mail referred to in response to interrogatory OCA/USPS-13, above.

RESPONSE:

a. Confirmed that the ODIS Quarterly Statistics Reports do not address levels of achieved performance for Overnight, 2nd Day, and 3rd Day service standards for Priority Mail. See the response to DFC/USPS-5.

b. Confirmed.

c. ODIS-RPW data relating to days-to-delivery against service standards are used at a local level to find and diagnose transit time failures. However, ODIS-RPW is not the best tool for measurement of service standard performance since it does not collect data more specific than three digit ZIP Codes at origin or destination. On a broader basis, ODIS data have long been used in proceedings before the Postal Rate Commission wherein service performance can become an issue. *See e.g.*, this response and the response to DFC/USPS-5.

d. Two systems collect information that bears on Priority Mail service performance. ODIS-RPW collects information about time in transit by recording both origin and

destination three digit ZIP Codes. However, since it does not measure entry to exit (delivery receptacle), an end-to-end measurement, its insight to service performance is only indirect. However, PETE does provide service performance information, as reflected in the response to DFC/USPS-5. The statement of work for PETE is available in USPS-LR-K-127. See also the response to OCA/USPS-105/R2001-1.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-16. Please refer to USPS-LR-K-82. Refer to page 10 of the ODIS *Quarterly Statistics Reports contained therein*, and the line "All Priority." Please define the terms "Identified" and Nonidentified" as they relate to Priority Mail.

RESPONSE:

"Identified" refers to markings on the mail piece that contain copyrighted logo, USPS. Examples include a USPS Priority Flat Rate Envelope, USPS tape or label, and USPS Priority Flat Rate Box. "Nonidentified" refers to mail pieces that do not have such marking information.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-17. Please refer to USPS-LR-K-82, the ODIS Quarterly Statistics Reports. Please explain how the ODIS data is used by the Postal Service to develop information on postal revenues, costs, and in postal operations.

RESPONSE:

This question is posed as if the proponent is unaware how ODIS data are used in ratemaking proceedings, which is contrary to fact. Today, ODIS and RPW have merged into the ODIS-RPW system, which is the foundation for Postal Service measurements of volume and revenue. In this docket, witness Pafford's testimony (USPS-T4) is the best source that explains how ODIS-RPW is used in developing information on postal revenues. ODIS-RPW does not collect information on costs, although they are relied upon in the Cost and Revenue Accounting process described by witness Meehan (USPS-T-9). Roadmap witness Alenier (USPS-T-33) relates witness Pafford's testimony to the development of information on postal revenues and costs for the Docket No. R2005-1 filing. Additional responsive information could be identified by researching the Postal Rate Commission's own web site, www.PRC.gov.

REVISED RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-18. Please refer to USPS-LR-K-82, the ODIS Quarterly Statistics Reports.

a. Please confirm that ODIS is the only data or measurement system that provides the average number of days to delivery for the mail classes and groups listed. If you do not confirm, please explain.
b. Please confirm that ODIS is the only data or measurement system that provides the percentage of mail delivered for Day 1 through Day 10 for the mail classes and groups listed. If you do not confirm, please explain.
c. Please confirm that ODIS is the only data or measurement system that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of mail delivered for Day 1 through Day 10. If you do not confirm, please explain.
d. Please confirm that ODIS is the only data or measurement system that provides the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, for the mail classes and groups listed. If you do not confirm, please explain.
e. Please confirm that ODIS is the only data or measurement system that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of intra-P&DC and Inter-P&DC volume, and the average number of days to delivery for such volume. If you do not confirm, please explain.

RESPONSE:

a-b, d. Not confirmed. *See e.g.*, the responses to DFC/USPS-5 and 7.

c,e. Partially confirmed. ODIS does provide information that is not duplicated elsewhere, but reliance only upon information uniquely available from ODIS would not, by itself, provide a sufficient basis for a meaningful comparison. Despite the surface attraction of comparing First-Class Mail to Priority Mail delivery performance using ODIS-RPW data, that surface perspective fails to recognize material distinctions between the two including such factors as shape, relative numbers of origin/destination pairs with a particular service standard, and respective haul profiles. Opinions about the relative service performance of First-Class Mail and Priority Mail could conceivably rely upon other information, including data from EXFC and PETE as well as personal experience. See also the response to DFC/USPS-26.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-19. Please describe and provide documentation for any and all methods by which the Postal Service

a. monitors and verifies that delivery offices actually deliver all mail sent from plants or directly entered,
b. records volumes sent from plants to delivery offices,
c. records and verifies payment of postage for mail entered at delivery offices.

RESPONSE:

a. Since the primary mission of the Postal Service is to bind the nation together by providing postal services, and since it would be impossible to meet this obligation without delivering mail, it is safe to say that every postal employee shares responsibility for seeing that the mail gets delivered. As a consequence, customers also expect delivery of mail; in the event mail delivery stopped, many of them would immediately demand that delivery resume. As such, this nation's entire population effectively "monitors or verifies that delivery offices actually deliver." The same could be said of essentially any information system kept by the Postal Service. Nationally, the Postal Service uses the Customer Service Daily Reporting System (CSDRS) and the ADVANCE system to monitor the delivery of committed mail by delivery offices. Various special services also entail recordation of information that constitutes evidence of delivery. Local managers complement this reporting process with daily operational teleconferences and on-site audits to monitor both service performance and reporting accuracy. See also the response of witness Lewis to OCA/USPS-T30-2 and materials cited therein. The ADVANCE Technical Guide is available in USPS-LR-K-129.

b. Please see the response of witness Lewis to OCA/USPS-T30-2 and materials cited therein. Delivery offices record volume according to the requirements of the Piece Count Recording System, which is documented in USPS-LR-K-128.

c. Mail entered at delivery units is fundamentally the same as mail entered at other postal facilities such that every system used in support of mail entry anywhere could also be used at a given delivery unit. Where delivery offices also include Bulk Mail Entry Units (BMUE), they follow normal BMEU procedures for recording and verifying payment for mail entered at the acceptance unit. Delivery units do not perform postage verification on mail that arrives at delivery units on postal or drop ship transportation because that mail has already been accepted elsewhere. Mail that arrives at a delivery

office as a drop-shipment has an accompanying manifest (PS Form 8125) which documents that the Postal Service has accepted the mail at the originating detached mailing unit or BMEU where the mailer holds a permit using the Plant Verification Drop Ship procedures. When mail has been entered elsewhere, delivery units do not check postage; Instead, they validate the volume and condition of the mail they receive with the accompanying manifest, and verify that the mail is being entered at the correct delivery unit.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-20. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning "identification of any performance goals," and the chart entitled "United States Postal Service Service Standards."

a. Please identify and describe the performance goals and/or service standards for Overnight, 2nd Day, and 3rd Day First-Class Mail.

b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

RESPONSE:

a&b. The service standards for First-Class Mail range from 1 to 3 days and vary depending on the 3-digit Zip Code of origin and destination for a First-Class Mail piece. These service standards are published in the Attachment referenced in the question with each omnibus rate request and were discussed throughout the record in Docket No. C2001-3.

OCA/USPS-21. Please refer to DMM §133.2.1., January 6, 2005, which states, in part, "The USPS follows uniform guidelines for distributing and delivering mail but does not guarantee delivery within the specified time. Local postmasters can provide more information."

a. Please provide the "uniform guidelines for distributing and delivering mail."

b. Please discuss the phrase "delivery within the specified time." What is (are) the "specified time" (or times) for First-Class Mail that is (are) not guaranteed?

Please describe and discuss the information that can be provided by local postmasters.

RESPONSE:

The uniform guidelines are those published in the Postal Operations Manual §§ 453 and 621 and duplicated below. The "specified time" is the service standard applicable to a specific 3-digit ZIP Code origin-destination pair. Postmasters and window clerks may and do routinely provide origin-destination service standard information in response to customer requests. Moreover, the *USPS Service Standards CD-ROM* which contains these service standards is revised quarterly and is provided to postal customers upon request.

POM § 453 -- Distribution Priorities

Distribute mail by these priorities:

a. Express Mail.

b. Priority Mail.

c. First-Class Mail.

d. Periodicals.

(1) Newspaper treatment Periodicals (marked "NEWS").

(2) All other Periodicals (marked "PER").

e. Standard Mail.

f. Package Services.

RESPONSE to OCA/USPS-212 continued:

POM § 621.1 -- Express Mail, First-Class Mail, and Priority Mail

Deliver on the first trip all Express Mail, First-Class Mail, and Priority Mail received at the central distribution facility prior to the established cut-off time.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-22. Please refer to the ODIS Quarterly Statistics Reports filed with the Commission as LR-K-82, Tables 6 through 9. For each table, please provide comparable data from the EXFC.

RESPONSE:

EXFC data regarding stamped and metered mail may be found in the response to

DBP/USPS-8(g). There are no EXFC data for presorted mail.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-23. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning "identification of any performance goals," and the chart entitled "United States Postal Service Service Standards."

a. Please identify and describe the performance goals and/or service standards for Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day Periodicals Mail.
b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

RESPONSE:

The service standards for Periodicals mail are reflected in the chart filed in response to Rule 54(n). They vary from overnight to seven days, depending on the relationship between the origin and destination 3-digit ZIP Code areas. The service standards for each 3-digit ZIP Code pair are published quarterly in the USPS Service Standards CD-ROM.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-24. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n), which states, in part, "The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set." Also please refer to the paragraph at the bottom of page 35, where it refers to "[a]chieved levels of performance."

a. Please confirm that the ODIS Quarterly Statistics Reports cited and filed with the Commission as LR-K-82 do not provide any data on the achieved levels of performance with respect to the Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day service standards for Periodicals Mail. If you do not confirm, please explain how the ODIS data relate to the achieved levels of performance for Periodicals Mail, and to the Periodicals Mail service standards referred to in response to interrogatory OCA/USPS-23, above. If you do confirm, please provide data on the achieved levels of performance with respect to the Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day service standards for Periodicals Mail.

b. Please confirm that the ODIS Quarterly Statistics Reports are not intended or designed to provide data on the achieved levels of performance with respect to the Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day service standards for Periodicals Mail. If you do not confirm, please explain.

c. Please explain how the Postal Service uses ODIS data to improve Periodicals Mail so as to achieve the Periodicals Mail service standards.

d. Please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the Overnight, 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day and 7th Day service standards for Periodicals Mail referred to in response to interrogatory OCA/USPS-23, above.

RESPONSE:

a. Confirmed. The subsequent request to provide data does not specify a source. Notwithstanding, given the question's context of ODIS-RPW data, one can note that ODIS-RPW would not be used to monitor whether Periodicals transit time estimates are achieved. Nor is other information available that permits monitoring of Periodicals transit time.

b. Confirmed.

c. Given the response to part (a), no such explanation is possible.

d. Local postal units may measure Periodicals service performance, especially for locally produced, entered and delivered publications, but no systematic measurements are known to exist.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-25. Please refer to Attachment F to the Request, page 35, and the chart entitled "United States Postal Service Service Standards." In the column Mail Class, please confirm that "Standard B" refers to the four subclasses of Package Services Mail, namely Parcel Post, Bound Printed Matter (BPM), Media Mail, and Library. If you do not confirm, please explain.

RESPONSE:

Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-26. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning "identification of any performance goals," and the chart entitled "United States Postal Service Service Standards."

a. Please identify and describe the performance goals and/or service standards for 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, and 9th Day separately for Parcel Post, BPM, Media Mail, and Library.

b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

RESPONSE:

These subclasses are identified as "Standard B" in the chart filed in response to Rule 54(n). Their service standards vary from 2 to 10 days, depending on the relationship between the origin and destination 3-digit ZIP Code areas. The service standards for each 3-digit ZIP Code pair are published quarterly in the USPS Service Standards CD-ROM.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-27. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n), which states, in part, "The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set." Also please refer to the paragraph at the bottom of page 35, where it refers to "[a]chieved levels of performance."

a. Please explain how the Postal Service uses ODIS data to improve Parcel Post, BPM, Media Mail, and Library [Mail] so as to achieve the service standards for these Package Services subclasses.

b. Please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, and 9th Day separately for the Parcel Post, BPM, Media Mail, and Library service standards referred to in response to interrogatory OCA/USPS-26, above.

RESPONSE:

a. For stamped and metered single piece Package Services, information on failures can help local staff diagnose and remediate systemic problems. National transit time estimates can provide tracking information on achievement levels. No information is available on how such data are integrated into decisions that may affect service standard performance.

b. For stamped and metered single piece Package Services, ODIS-RPW provides information that can be used as described in the response to part (a).

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-28. Please refer to Attachment F to the Request, page 35, and the chart entitled "United States Postal Service Service Standards." In the column Mail Class, please confirm that "Standard A" refers to the four subclasses of Standard Mail, namely Regular, Enhanced Carrier Route, Nonprofit, and Nonprofit Enhanced Carrier Route. If you do not confirm, please explain.

RESPONSE:

Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-29. Please refer to Attachment F to the Request, page 35, the text of Rule: 54(n) concerning "identification of any performance goals," and the chart entitled "United States Postal Service Service Standards."

a. Please identify and describe the performance goals and/or service standards for 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day separately for Regular, Enhanced Carrier Route, Nonprofit, and Nonprofit Enhanced Carrier Route.

b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

RESPONSE:

These subclasses are identified as "Standard A" in the chart filed in response to Rule 54(n). Their service standards vary from 2 to 10 days, depending on the relationship between the origin and destination 3-digit ZIP Code areas. The service standards for each 3-digit ZIP Code pair are published quarterly in the USPS Service Standards CD-ROM.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-30. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n), which states, in part, "The Request must identify the achieved levels of service for those classes and subclasses of mail and mail services for which performance goals have been set." Also please refer to the paragraph at the bottom of page 35, where it refers to "[a]chieved levels of performance."

a. Please confirm that the ODIS Quarterly Statistics Reports cited and filed with the Commission as LR-K-82 do not provide any data on the achieved levels of performance with respect to the for 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day service standards separately for Regular, Enhanced Carrier Route, Nonprofit, and Nonprofit Enhanced Carrier Route. If you do not confirm, please explain how the ODIS data relate to the achieved levels of performance for Standard Mail, and to the Standard Mail service standards referred to in response to interrogatory OCA/USPS-29, above. If you do confirm, please provide data on the achieved levels of performance with respect to the for 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day service standards separately for Regular, Enhanced Carrier Route, Nonprofit, and Nonprofit Enhanced Carrier Route..

b. *Please confirm that the ODIS Quarterly Statistics Reports are not* intended or designed to provide data on the achieved levels of performance with respect to the 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day service standards for Standard Mail. If you do not confirm, please explain.

c. Please explain how the Postal Service uses ODIS data to improve Standard Mail so as to achieve the Standard Mail service standards.

d. Please identify and describe any statistical or other measurement system that provides data on the achieved levels of performance with respect to the 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, 9th Day, and 10th Day service standards for Standard Mail referred to *in response to interrogatory OCA/USPS-29, above.*

RESPONSE:

a. Confirmed. No such data are available.

b. Confirmed.

c. Given the responses to parts (a) and (b), perforce no such explanation could be forthcoming.

d. No such statistical or other measurement system is known to exist.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-31. Please refer to the response of witness Lewis to interrogatory VP/USPS-T30-3. Please provide a list and description of all systems of records maintained by the Postal Service from which the response can be extracted.

RESPONSE:

The information came from the Address Management System, which contains all valid domestic delivery addresses.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-32. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n) concerning "identification of any performance goals.

a. Please identify and describe the performance goals and/or service standards for the Special Services in Tables 11 and 12 of USPS-T-28, including the "Other Special Services" listed in Note 5.

b. Please provide a citation to the DMM, January 6, 2005, or any other Postal Service document, supporting the response to subpart a. of this interrogatory.

RESPONSE:

a-b. Special services generally are ancillary to the mail classes, which have their own service standards. There are no service or performance goals, objectives, or directives for the special services listed in Tables 11 and 12 of USPS-T-28, except for the following:

- Publication 122 states that a properly completed and supported claim is usually paid within 10 to 15 days after the St. Louis Accounting Service Center receives the claim from the Post Office where filed.
- The goal for Delivery Confirmation and Signature Confirmation services is a delivery scan rate of 98 percent for Priority Mail, 97 percent for First-Class Mail parcels, and 97.5 percent for Package Services, according to WEBeis.
- DMM § 507.6.3.6 states that, with the exception of the period between November 16 and January 1, the Postal Service corrects and returns a mailing list within 15 workdays, with respect to Address Changes for Election Boards, Correction of Mailing Lists, and ZIP Coding of Mailing Lists services.

Revised July 8, 2006

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-33. Please refer to Attachment F to the Request, page 35, and the text of Rule: 54(n) concerning "identification of any performance goals.

a. In the absence of any performance goals and/or service standards identified pursuant to Rule: 54(n) for the Special Services in Tables 11 and 12 of USPS-T-28, has the Postal Service established any other service objectives or directives concerning these special services? Please explain, and provide such service objectives or directives.

b. In the absence of any performance goals and/or service standards identified pursuant to Rule: 54(n) for the Special Services in Tables 11 and 12 of USPS-T-28, please explain how the Postal Service measures the level of service provided for these special services.

c. Please identify and describe any statistical or other measurement system that provides data on the level of service provided with respect to the performance goals and/or service standards, or service objectives, referred to in response to interrogatory OCA/USPS-32(a), above, and subpart a. of this interrogatory, for the Special Services in Tables 11 and 12 of USPS-T-28.

RESPONSE:

a. See the responses to OCA/USPS-32 and OCA/USPS-166.

b. The Postal Service tracks volumes and revenues for the special services, and receives customer complaints and compliments.

c. No statistical or other measurement systems are used, except that the Product Tracking System is used to measure delivery scan rates for Certified Mail, Delivery Confirmation, and Signature Confirmation.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-34.

Please refer to the Domestic Mail Manual (DMM) §604.1.1, January 6, 2005, and the table referencing First-Class Mail precanceled, nondenominated presorted rate postage stamps.

a. Please state whether there are precanceled, nondenominated presorted rate postage stamp(s) for each First-Class Mail presorted rate category, and *provide the rates of postage for each stamp.*
b. Please provide the date that the Postal Service first offered precanceled, nondenominated presorted rate postage stamps with respect to each First-Class Mail presorted rate category identified in subpart a. of this interrogatory.
c. Please provide the date(s) that the Postal Service changed the design of the precanceled, nondenominated presorted rate postage stamps with respect to each First-Class Mail presorted rate category identified in subpart a. of this interrogatory.
d. Please state whether there exists nondenominated postage stamps for any First-Class Mail subclass or rate category, other than nonautomation presort and automation presort rate categories, and provide the rates of postage for each stamp.

RESPONSE

a. *There are precanceled, nondenominated presorted rate postage stamps for* only two First-Class Mail presorted rate categories: one for letter rate mail, and one for postcard rate mail. Neither is designed to cover a specific rate in its entirety; rather, they prepay only a portion of the rate, with the balance to be paid by the mailer along with the statement of mailing. Since their inception, the postcard-rate stamp has been valued at 15 cents, and the letter-rate stamp at 25 cents. It was intended that these rates would remain unchanged until such time as the Postal Service determined that the difference between the "face" value and the lowest possible presort rate for which the stamp could be used became too great to justify their continued sale at that price. It was further intended that the sale price would be kept at easily-calculated increments, such as 5 cents or 10 cents.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

RESPONSE to OCA/USPS-34 (continued):

b. Letter rate, March 17, 1995, Jukebox design. Postcard rate, March 17, 1995, Auto Tail Fin design.

c. Letter rate, June 5, 1998, Diner design; June 26, 2003, American Eagle design (10 designs which vary by color). Postcard rate, August 3, 2001, Woody Wagon design.

d. Other than the two presort rates noted, only the rate-change nondenominated stamps would address this question in the broadest sense, all of which meet the basic First-Class Mail per piece letter rate. They are outlined and illustrated at DMM 604.1.2 with their postage values.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-35

Please refer to the Domestic Mail Manual (DMM) §604.1.1, January 6, 2005, and the table referencing Standard Mail precanceled, nondenominated presorted rate postage stamps.

a. Please state whether there are precanceled, nondenominated presorted rate postage stamp(s) for each Standard Mail subclass or rate category, and provide the rates of postage for each stamp.

b. Please provide the date that the Postal Service first offered precanceled, nondenominated presorted rate postage stamps with respect to each Standard Mail subclass or rate category identified in subpart a. of this interrogatory.

c. Please provide the date(s) that the Postal Service changed the design of the precanceled, nondenominated presorted rate postage stamps with respect to each Standard Mail subclass or rate category identified in subpart a. of this interrogatory.

RESPONSE:

a. There is a single precanceled, nondenominated presort rate postage stamp for Standard Mail. It does not cover any specific rate in its entirety; rather, it prepays only a portion of the rate, with the balance to be paid by the mailer along with the statement of mailing. Since its inception, when it was inscribed "Bulk Rate," it has been valued at 10 cents. There is a single stamp for Nonprofit Standard Mail as well, valued since its inception at 5 cents.

b. December 13, 1991, Eagle and Shield design, inscribed "Bulk Rate USA." Nonprofit: January 12, 1995, "G" Flag design.

c. May 29, 1993, Eagle and Shield design, inscribed "USA Bulk Rate"; March 10, 1995, Auto Fender design, inscribed "Bulk Rate"; August 14, 1998, Bicycle design, inscribed "Presorted Std."; November 9, 2000, Library Lion design; June 29, 2001, Atlas design. Nonprofit: March 10, 1995, Butte

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY**

RESPONSE to OCA/USPS-35 (continued):

design; March 16, 1996, Mountain design; June 5, 1998, Wetlands design; October 21, 2002, Seacoast design.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-36

Please refer to the DMM §604.1.1, January 6, 2005, concerning precanceled, nondenominated presorted postage stamps for First-Class Mail and Standard Mail.

a. Please identify and discuss the policies and other factors considered that resulted in the Postal Service's initial decision to issue precanceled, nondenominated presorted postage stamps for First-Class Mail and Standard Mail.
b. Please provide any economic, marketing, or other research or documentation supporting the Postal Service's initial decision to issue precanceled, nondenominated presorted postage stamps for First-Class Mail and Standard Mail.
c. Please provide any Postal Service economic, marketing, or other research or documentation prepared subsequent to the Postal Service's initial decision to issue precanceled, nondenominated presorted postage stamps for First-Class Mail and Standard Mail with respect to such postage stamps.
d. Please provide any economic, marketing, or other research prepared by the Postal Service or any other entity concerning a nondenominated single-piece, first-ounce First-Class Mail postage stamp.

RESPONSE:

a. As the number of rate categories and discounts multiplied, the Postal Service did not consider that it could issue denominated postage for each rate and classification. The fractional-rate and decimal-rate values also became too numerous to cover adequately. Attempts to identify the most-used rates also proved difficult, as mailers moved to deeper and deeper presort discounts on an ongoing basis. The "Bulk Mail" effort in 1991 was somewhat experimental, but very successful.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

RESPONSE to OCA/USPS-36 (continued)

b-c. There was a great deal of anecdotal evidence suggesting that the idea would be responsive to the needs of bulk mailers, many of whom were of the view that mail with stamps elicited a greater response rate than metered mail.

d. Please see USPS Library Reference K-134 which will be filed shortly.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-37

Please refer to the DMM § 604.1.2, January 6, 2005, which states, in part, "Unless excepted by standard, the total postage affixed must equal at least the postage charge for the class of mail and if applicable, the fee for the extra service requested." Please explain the phrase "excepted by standard' as used in the context of the above quoted language. Please give examples.

RESPONSE:

Reading it as "authorized elsewhere in the DMM" may help. Examples include the use of Presort First-Class Mail and Presort Standard Mail stamps. These stamps, when used conventionally by bulk permit holders, do not reflect the full applicable postage per piece. The appropriate bulk postage balance due is paid when the mailing is presented by the bulk permit holder for acceptance.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-38

Please refer to the DMM §604.1.2, January 6, 2005, which states, in part, "All nondenominated postage and makeup rate stamps, including official mail stamps, are valid at the original rates of issue."

a. Please define the phrase "nondenominated postage . . . stamps." Are semipostal stamps defined as nondenominated postage stamps?
b. Please define the phrase "makeup rate stamps." Are makeup rate stamps defined as nondenominated postage stamps?
c. Please define the phrase "official mail stamps." Are official mail stamps defined as nondenominated postage stamps?

RESPONSE:

a. "Nondenominated postage stamps" are those which do not bear a particular postage rate on their face but are generally intended for use in connection with a specific rate category or type of mail, such as the stamps issued in connection with First-Class Mail basic rate changes or the presort stamps described in response to OCA/USPS-34-36. It is fair to say that the term "nondenominated postage stamps" had a life of its own before the introduction of nondenominated semipostal stamps.

b. "Makeup rate stamps" are nondenominated postage stamps that represent the value of the difference between the old basic First-Class Mail rate and the rate that succeeds it. The value of a particular makeup stamp could coincide with the value of an existing denominated stamp.

c. "Official Mail stamps" are not necessarily nondenominated, but at rate changes, the Postal Service has occasionally issued a nondenominated Official Mail postage stamp for use in mailing basic rate First-Class Mail by government agencies.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-39

Please refer to the DMM §604.1.2, January 6, 2005, which states, in part, "All nondenominated postage and makeup rate stamps, including official mail stamps, are valid at the original rates of issue."

a. Please explain how postage revenue is protected by the Postal Service in the case where precanceled, nondenominated presorted postage stamps purchased in a period prior to a change in presort rates are used in periods subsequent to the change in presort rates?

b. Please provide any reports by the Postal Service, the Postal Inspection Service, the Office of Inspector General, or Government Accountability Office concerning revenue protection by the Postal Service in the case where precanceled, nondenominated presorted postage stamps purchased in a period prior to a change in presort rates are used in periods subsequent to the change in presort rates?

RESPONSE:

a. Except in the rare circumstance where misuse is involved, mail bearing these stamps is entered at Business Mail Entry Units. The mailing and its accompanying mailing statement are subject to review and verification at the BMEU as a condition of acceptance. As with any other shortpaid bulk mail, the mailer is required to pay additional postage to cover any difference between the value of an under-rate precanceled presort stamp on a mail piece and the applicable current rate for that piece as a condition of mailing.

b. No such reports have been found.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-40. Please refer to the DMM §604.1.10c., January 6, 2005, which states, in part, "The postage value of semipostal stamps purchased before any subsequent change in the First-Class Mail nonautomation single-piece first-ounce letter rate is unaffected by any subsequent change in that rate."

a. Please confirm that the Breast Cancer semipostal stamp, when initially issued, was priced at 40 cents. If you do not confirm, please explain.
b. Please confirm that the "postage value" of the Breast Cancer semipostal stamp, when initially issued, was 32 cents. If you do not confirm, please explain.
c. Please confirm that the design of the Breast Cancer semipostal stamp has not changed since it was initially issued. If you do not confirm, please explain.
d. Pursuant to the sentence quoted above, please confirm that customers who purchased a Breast Cancer semipostal stamp when the "postage value" was 32 cents may use that semipostal stamp, without adding any additional postage, for a First-Class Mail nonautomation single-piece first-ounce letter. If you do not confirm, please explain.

RESPONSE:

a-c. Confirmed.

d. Such use may indeed occur, but would be contrary to DMM §604.1.10c. The postage value of the semi-postal stamp described in the question remains at 32 cents. See also, Postal Bulletin 22071 (March 7, 2002), page 3, which indicates:

> The nondenominated . . . semi-postal stamps postage value is set at the time of purchase. Customers are welcome to use any . . . semi-postal stamps they purchased when lower rates were in effect, but if stamps were purchased before the last rate change in January 2001, they should affix additional postage to reach the appropriate rate based on the size and weight of their letters or parcels. There is, however, no easy way for the Postal Service to determine when the stamps were purchased. Consequently, employees must assume the stamps are being used properly and at the current First-Class Mail rate, and they should not treat pieces bearing the . . . semipostal as shortpaid.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-41. Please refer to the DMM §604.1.10c., January 6, 2005, which states, in part, "The postage value of semipostal stamps purchased before any subsequent change in the First-Class Mail nonautomation single-piece first-ounce letter rate is unaffected by any subsequent change in that rate." Also, please refer to USA Philatelic ("Comprehensive Edition"), Summer 2005, Vol. 10, No. 2, page 16, and the Note which states: "Postage value of Breast Cancer semi-postal will be valued at current First-Class rate." Please reconcile the sentence from the DMM with the Note from USA Philatelic.

RESPONSE:

Both statements refer to the same semi-postal stamps being sold at the time each publication was issued.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-42

Please refer to the DMM §604.3.2.1, January 6, 2005.

a. Please provide a copy of Form 3615, authorization to use precanceled stamps.

b. At the end of FY 2004, how many mailers were authorized to use precanceled stamps?

RESPONSE:

a. A copy is attached.

b. A response is forthcoming.

United States Postal Service®

Mailing Permit Application and Customer P

(See instructions *rse)*

Two types of identification are required. One must contain a photograph of the addressee(s). Social Security cards, credit cards, and birth certificates are unacceptable as identification. The agent must write in identifying information. Subject to verification.

Acceptable identification includes: valid driver's license or state non-driver's identification card; armed forces, government, university or recognized corporate identification card; passport or alien registration card or certificate of naturalization; current lease, mortgage or Deed of Trust; voter or vehicle registration card; or a home or vehicle insurance policy. A photocopy of your identification may be retained by agent for verification.

A. Applicant Information *(Please print or type)*

1. Individual or Company Name
2. Date
3. Applicant's Signature ▶
4. E.. ail Address
5a. Enter first ID number
6. Address *(Street and number, apt. or suite no., city, state, and ZIP + 4)*
5b. Enter second ID number
7. Other Names Under Which Company Does Business *(If applicable)*
8. How can we Contact You?
   Phone Email Mail
9. Federal Agency Cost Code *(If applicable)*
10. Will Present Plant Verified Drop Shipment (PVDS)?
    Yes No
11. Contact Person
12. Telephone *(Include area code)*

B. Check Type of Permit/Authorization Requested

For Postal Service Use

	Permit Number	Date Issued	Date Fee Paid	Date Canceled	Sample Approved
1. ☐ **Permit Imprint Authorization** *(Fee applies)* ☐ First-Class® Mail ☐ Std. Mail ☐ Pkg. Svcs. Company Permit					
2. ☐ Precanceled Stamp or Government Precanceled Stamped Envelope Authorization *(No fee)*					
Mailer Precanceled Postmark/Preprinted Rate Markings Authorizations *(No fee)*					
☐ **Notification to Present Metered Mail in Bulk** *(No fee)*					
Class of Mail ☐ First-Class® Mail ☐ Std Mail ☐ Pkg. Svcs.					
3. ☐ **Business Reply Mail (BRM) Authorization** *(Fee applies)*					
a. Post Office where BRM will be received					
b. Post Office where BRM permit number was issued and annual fee was paid, if applicable					
☐ **BRM Advance Deposit Account** *(Fee applies)* **QBRM Approved**					
4. ☐ **Merchandise Return Service (MRS) Authorization** *(Fee applies)*					

a. Type of Application ☐ Initial ☐ Reapplication

b. Return Location ☐ Single ☐ Multiple *(See over)*

c. Advance Deposit Account ☐ Each Location ☐ Centralized

d. Permit Applied For ☐ First-Class® Mail/Priority Mail ☐ Std. Mail ☐ Media Mail ☐ PP ☐ BPM ☐ Library Mail (LM)

PS Form **3615,** December 2002

Permit Imprint Authorization

(See instructions on reverse)

Permit Number | Date P ...ued

Fee Due $ | AIC 140

Please Keep This Card for Your Records

Postmaster or Designee Signature

Issuing Office

Precanceled Stamps Authorization or Notification to Present Metered Mail in Bulk

(See instructions on reverse)

Permit Number | Date Permit Issued

Please Keep This Card for Your Records

Postmaster or Designee Signature

Issuing Office

Business Reply Mail Authorization

(See instructions on reverse)

Permit Number | Date Permit Issued

Fee Due $ | AIC 134

BRM w/Advance Deposit Account Fee Due $ | AIC 116

Please Keep This Card for Your Records

Postmaster or Designee Signature

Issuing Office

Merchandise Return Service Authorization

(See instructions on reverse)

Permit Number | Date Permit Issued

Fee Due $ | AIC 141

Please Keep This Card for Your Records

Postmaster or Designee Signature

Issuing Office

4712

Standards for Mailing Using Permit Imprints *(DMM P040)*

1. The content ; at must meet the standards in *Domestic Ma. al* P023.
2. Mail must be presented and accepted where the permit was issued unless permitted by other applicable standards.
3. Payment for each mailing must be made when the mailing is presented at the post office.
4. Mail must not be deposited in street collection boxes.
5. Minimum quantities apply and all pieces must be of identical weight, unless otherwise authorized.

NOTE: Annual fees apply to presort or bulk mail.

Detached from Form 3615, Dec. 2002

Standards for Mailing With Precanceled Stamps or Metered Mail in Bulk *(DMM P023)*

Mail must:

1. Be presented for acceptance and verification where the permit is held.
2. Not be deposited in street collection boxes.
3. Bear markings and endorsements required for the rate claimed or service requested.
4. Have a complete return address.

NOTE: Annual fees apply to presort or bulk mailings. Obtain appropriate meter slug from meter manufacturer.

Detached from Form 3615, Dec. 2002

Standards for Business Reply Mail (BRM) *(DMM S922)*

1. Permit holder guarantees payment for proper First-Class postage, plus a per-piece fee.
2. No special services are permitted.
3. Mail may not be converted for any other purpose than that intended by the permit holder.
4. Format requirements apply.
5. Annual fees apply.

Detached from Form 3615, Dec. 2002

Standards for Merchandise Return Service (MRS) *(DMM S923)*

1. Foreign services are unavailable.
2. Format samples must be approved before using MRS.
3. Special services are available.
4. Annual fees apply.

Detached from Form 3615, Dec. 2002

Instructions

General

This form replaces Form 3601, *Applicatio Without Affixing Postage Stamps*; Form 3614, *Application for Business Reply Permit*; Form 3 cation/Permit to *Use Precanceled Stamps or Government Precanceled Stamped Envelopes*; and Form 3625, *Merchandise Return Permit Application.*

This form creates a comprehensive file about customers who use these services, including a record of customers mailing in bulk with meter postage affixed and those who are presenting plant verified drop shipment (PVDS) or approved for Qualified Business Reply Mail (QBRM) rates. This form also documents when permits were issued or canceled, initial fees paid, and samples approved. You may use one form and update it as needed. If files are kept in separate locations, you may use a separate form for each service.

How to Complete This Form

Section A, *Applicant Information*

1. Enter individual or company name under which mailings will be entered.
2. Enter the date application was submitted
3. Signature of person completing form.
4. Applicant's email address
5a&b Enter two types of identification.
6. Enter complete mailing address of individual or company.
7. Enter the other names under which company does business.
8. Enter method(s) of contact
9. Complete if applicant is a federal agency presenting mail under Official Mail Accounting System (OMAS).
10. Indicate whether mailer is or will be presenting plant verified drop shipments (PVDS). (For informational purposes only).
11. Enter the name of the contact person (a person with whom postal personnel can discuss discrepancies, etc.)
12. Enter the telephone number of contact person named in item 11.

Section B, *Check Type of Permit/Authorization Requested*

1. Complete if mailer will mail using a permit imprint (DMM P040). NOTE: Check "Company Permit" box if appropriate.
2. Complete if mailer will mail under DMM P023.
   a. Complete if mailer is requesting authorization to use a precanceled postmark or to preprint rate markings under DMM P023.3 1.
   b. Complete if mailer is licensed to meter mail under DMM P030 and presents metered mail in bulk.
3. Complete if mailer is requesting to receive mail under DMM S922.
   a. Enter name of post office where mail will be received
   b. Complete if mailer is authorized and pays fees at another post office.
   c. Check if mailer is requesting BRM advance deposit account.
   d. Check if mailer is requesting the QBRM rate.
4. Complete if mailer is requesting approval to present mail under DMM S923.
   a. Check "Initial" if a first-time applicant for MRS. NOTE: Check "Reapplication" if mailer has been denied under DMM S923 and wants to reapply.
   b. Check kind of mail MRS applies to.

What to Give the Customer

Complete and detach the coupon corresponding to the service(s) requested and give to the customer. Advise the customer to keep their coupon(s) to reference the account(s). Customers should keep the coupon(s) along with their copy(ies) of Form 3544, *Post Office Receipt for Money*, which they will receive after paying the required fee.

How to File This Form

File the form alphabetically by customer's last name. Post offices where records are maintained manually must use Form 3609, *Record of Permit Imprint Mailings*, to establish a corresponding numerical record of permit holders. Use Form 25, *Trust Fund Account*, for all other services. Post offices with a mail classification automated system (such as the Bulk Revenue and Volume Information System (BRAVIS) or the Permit system) that provides computation and individual customer account recordkeeping need not maintain a separate manual record.

Multiple Return Locations *(See B4 on front)*

1.	2.	3.	4.	5.	6.
7.	8.	9	10.	11.	12

4713

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

Revised: July 8, 2005

OCA/USPS-42. Please refer to the DMM §604.3.2.1, January 6, 2005.

* * *

b. At the end of FY 2004, how many mailers were authorized to use precanceled stamps?

RESPONSE:

b. The Postal Service does not centrally aggregate local PS Form 3615 data regarding precanceled stamp permits and, therefore, cannot provide a responsive figure.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

OCA/USPS-43. Please list every domestic retail service sold by the Postal Service to the public, on a nationwide basis, that is not contained within the Domestic Mail Classification Schedule. This interrogatory applies to all services currently offered by the Postal Service to the public, including philatelic services. This interrogatory also applies to any services made available to the public since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such services were terminated prior to the filing of this set of interrogatories.

a. Provide a detailed description of the service.
b. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
c. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
d. On what date was this service first offered to the public?
e. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
f. Provide a description of the primary purchasers of the service.
g. Provide a complete description of the activities performed by the Postal Service in providing the service.
h. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
i. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
j. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
k. Submit all of the annual revenues earned by the Postal Service in providing the service.
l. Submit annual volume figures for each service, by billing determinant.
m. Submit annual net income (loss) figures for the service since the service was first made available to the public.
n. Submit total revenues for the service for the entire period since the service was first made available to the public.
o. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.
p. Submit total net income (loss) figures for the service since the service was first made available to the public.
q. Give a precise citation in the current filing for every figure

submitted in parts j. – p.

r. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.

s. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

RESPONSE:

A partial objection was filed on May 23, 2005. Certain responsive information, however, has been provided in response to OCA/USPS-53.

EXPANDED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

service was first made available to the public.

q. Give a precise citation in the current filing for every figure submitted in parts j. – p.

r. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.

s. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

RESPONSE:

This expanded response is filed pursuant to Presiding Officer's Ruling No. R2005-1/58 (July 22, 2001). As the Postal Service understands that Ruling, it is to review the information previously provided in response to OCA/USPS-53, specifically address whether that material covers all nonpostal services, and provide additional information as necessary.

In general, except as discussed below, the information initially provided in response to OCA/USPS-53 does cover all nonpostal services offered during the base year.

Photocopy Service

The Postal Service permits the installation of coin-operated photocopying machines in the lobbies of offices for customer use in many areas. The machines are owned and maintained by commercial firms, which are selected on a competitive basis. A portion of the proceeds from these machines is paid to the Postal Service. Gross revenue from such machines in FY04 was

EXPANDED RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

$17,438(000). The Postal Service's share of gross revenue differs based on local agreements, and therefore a comprehensive net revenue figure is not available.

Unisite Antenna Program

This no longer exists as a discrete alliance program. (Even when it did exist, of course, it would never have been considered a "retail" program by any definition of that term.) While the Postal Service still leases space on its property for antenna towers, such arrangements are done on an *ad hoc* basis, and the associated revenue is treated as other lease revenue.

Passport Photos

Contrary to the OCA's insinuations, the response to OCA/USPS-53 did not ignore passport photos. In fact, as even acknowledged in the OCA's Motion to Compel at 18, the Postal Service's description in Attachment Two to that response clearly indicated that photo service was included as part of the information provided. Thus, the FY04 passport revenue reported in Attachment One, as correctly surmised in Ruling No. 58, is the sum of the passport application revenue, and passport photo revenue.

The situation with expenses is less clear. It would not be possible to state with certainty that no passport photo clerk time expense is included with the reported passport expense unless it was known with certainty that, when sampling a clerk taking a passport photo at the time of the reading, no IOCS data collector ever recorded that tally as passport. To the extent that such situations arose, some data collectors may have handled it one way, other may have

handled it differently. To clarify such situations, starting in FY06, the IOCS will have separate entries for passport application and passport photo. With respect to FY04, however, out of concerns that the available IOCS information might relate to both passport applications and passport photos, the response to OCA/USPS-53 treated passports as an aggregate.

In the course of preparing this expanded response, however, it was determined that $155(000) of FY04 expense for camera purchases was not included in the passport expense amount reported in Attachment One. (Similarly, the FY03 passport expense number does not include camera purchases of $971(000) made in that year.) There may also be additional amounts for equipment and supplies relating to passport photos that were incurred by local offices and booked under other account numbers. Those figures, while believed to be relatively minor, are not available.

Phone Cards

Ruling No. 58 requested clarification of the discrepancy in FY04 revenue reported for phone cards between Attachment One to OCA/USPS-53, and POIR No. 5, Question 15. The $12.2 million reported in the POIR response was a gross alliance revenue amount, while the $8.1 million reported in Attachment One was a net revenue amount to the Postal Service, with the balance of the $12.2 million going to the alliance partner for the cost of the phone cards.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

OCA/USPS-46. Please list every pilot test of a potential domestic postal retail service currently being offered by the Postal Service to one or more potential customers. This interrogatory also applies to any pilot tests made available to one or more potential customers since the record was closed in Docket No. R2001-1, on March 7, 2002, even if such pilot tests were terminated prior to the filing of this set of interrogatories. This interrogatory applies to pilot tests that are nationwide, regional, or local in scope.

a. Provide a detailed description of the pilot test.
b. For each pilot test, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
c. For each pilot test based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
d. State the number of participants in the pilot test and describe the nature of their business.
e. State the geographic scope of the pilot test.
f. State the criteria for allowing certain mailers (or recipients) to participate, but not others.
g. Have any mailers (or recipients) asked to participate but were denied the opportunity to participate? If so, state the number so denied and the grounds for the denial.
h. What classes, and/or postal services or products, are potentially affected by the pilot test? How are they affected?
i. On what date was this pilot test initiated?
j. Is this pilot test still being conducted? If not, when was the pilot test discontinued? State the reasons for discontinuing the pilot test.
k. Provide a description of the primary intended users of the potential service.
l. Provide a complete description of the activities performed by the Postal Service in conducting the pilot test.
m. Submit each rate or fee, if any, charged under the pilot test.
n. Submit all of the annual, accrued direct and indirect costs, separately identified, to conduct the pilot test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each pilot test that has been terminated or discontinued.
o. Submit all of the annual revenues, if any, earned by the Postal Service in conducting the pilot test.
p. Submit annual volume figures for each pilot test, if any, by billing determinant.
q. Submit annual net income (loss) figures, if any, for the pilot test since the pilot test was first initiated.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

r. Submit total revenues for the pilot test, if any, for the entire period since the pilot test was first initiated.
s. Submit total costs (both start-up and operating) for the entire period since the pilot test was first initiated.
t. Submit total net income (loss) figures for the pilot test since the pilot test was first initiated.
u. Give a precise citation in the current filing for every figure submitted in parts n. – t.
v. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.

RESPONSE:

A partial objection was filed on May 23 2005.

a. The Postal Service conducted a pilot test for a concept designated as Friend-to-Friend (FTF) Mail. FTF was a First-Class Mail service enhancement that enabled a postcard distributor to assume the cost of postage on cards mailed by individuals to other individuals. The cards would be addressed by the sender and mailed to the addressee. The cards usually would advertise a product or service and allow room for the sender to transmit a personal message to the recipient. The distributor would pay postage only on an "as-used" basis. Under FTF, the distributor, typically an advertiser, could distribute the postcards in a variety of ways, such as part of a direct mailing, as magazine inserts, or as hand-outs. FTF cards used a PLANET Code and other markings to create a unique identifier for each mail piece. The unique identifier was designed with the objective of enabling the Postal Service to track how much postage was due from each distributor on the basis of scans of each card during transit from entry into the mail stream until delivery. The test was limited to cards. The test was designed to determine whether, with new software to count individual cards, FTF

could rely on CONFIRM to account for scanning activity. During the test, various program elements were tested and revised. The Postal Service began soliciting card distributors for the test in April 2001. The test was closed to new card distributors in April 2003. After July 31, 2003, participants were no longer allowed to distribute new cards. FTF postage payment accounts were required to stay active for a year after distribution terminated in anticipation of cards continuing to enter the mail stream.

b. The test was not based on a strategic alliance.

c. See answer to (b) above.

d. In all, there were 92 card distributors, representing a broad range of industry sectors. Participation was strongest among customers in the Retail and Catalog sectors, as well as in Travel/Resorts, Casinos, and Entertainment.

e. The test was national in scope.

f. Mailers had to agree not to use FTF cards as a substitute for existing Business Reply Mail.

g. Approximately three mailers indicated a desire to use the cards as a substitute for existing BRM and were denied participation.

h. First-Class Mail cards were affected because the test generated new volumes. CONFIRM was affected because FTF employed the same technology to perform the scanning. Standard Mail could have been affected, to the extent that card distributors opted to use First-Class Mail FTF postcards as a medium for reaching potential customers in lieu of Standard Mail. Business Reply Mail could have been affected, to the extent that any participant opted to use FTF

instead of BRM.

i. The USPS began soliciting customers for the test in April 2001.

j. The pilot test closed to new customers in April 2003 so that the concept could be reviewed and a determination made regarding whether to have senior management seek approval from the Board of Governors to submit a request to the Postal Rate Commission. Existing FTF customers were allowed to distribute already-produced cards to the public until July 31, 2003. FTF postage payment accounts were required to stay active for a year after distribution terminated in anticipation of cards continuing to enter the mail stream.

k. During the pilot test, the intended primary commercial users were advertisers interested in leveraging their existing customer bases to deliver their messages to potential new customers. The advertisers distributed the cards to consumers, who could then mail them at the advertiser's expense to a third party.

l. Activities included:

an alpha test to assess card design specifications

redesign of card specifications based on the alpha test

a structured internal test conducted in early 2001 to assess the FTF scan rate using the redesigned cards

formal and informal sales efforts through the USPS sales force, and with some unmanaged account, outreach by other USPS employees

for each card customers planned to used, review of card samples/.pdf files

preparation of bi-weekly activity reporting by account, using CONFIRM data

billing of participating customers and accounting

on-going reviews of scanning and accounting performance by USPS

employees.

m. Single-piece First-Class Mail card postage was charged for each piece scanned.

n. Objection filed.

o. Revenues would equal the First-Class Mail postcard rate times the number scanned cards reflected below in response to subpart (q).

p. 2,612,084 single-piece First-Class Mail cards were scanned during the test.

q.-v. Objection filed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

OCA/USPS-51. Please re-submit Attachment 1 to the Postal Service's response to interrogatory OCA/USPS-239, Docket No. R2001-1, dated December 17, 2001, with additional columns for all quarters since QIII, FY 2001, through the most recent quarter.

a. What is the "SEDS" umbrella suite of services that is cited in footnote 1 of the attachment?
b. Please list every discrete service in the "SEDS" umbrella suite of services.
c. For every discrete service in the "SEDS" umbrella suite of services provide the following (please provide the information requested below separately for PostECS; and Electronic Postmark):
    i. Provide a detailed description of the service.
    ii. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
    iii. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
    iv. On what date was this service first offered to the public?
    v. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
    vi. Provide a description of the primary purchasers of the service.
    vii. Provide a complete description of the activities performed by the Postal Service in providing the service.
    viii. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
    ix. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
    x. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
    xi. Submit all of the annual revenues earned by the Postal Service in providing the service.
    xii. Submit annual volume figures for each service, by billing determinant.
    xiii. Submit annual net income (loss) figures for the service since the service was first made available to the public.
    xiv. Submit total revenues for the service for the entire period since the service was first made available to the public.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

xv. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.

xvi. Submit total net income (loss) figures for the service since the service was first made available to the public.

xvii. Give a precise citation in the current filing for every figure submitted in parts j. – p.

xviii. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.

xix. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services that are not classified in the DMCS have been allocated to the (1) DMCS group and (2) the non-DMCS group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.

RESPONSE:

A partial objection was filed on May 23, 2005. See, however, the attachments provided in response to OCA/USPS-53, which include updated information on EPM, which is the only service relevant to this question which operated in the base year in this proceeding.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

OCA/USPS-52. Please re-submit Attachment 1 to the Postal Service's response to interrogatory OCA/USPS-240, Docket No. R2001-1, dated December 17, 2001, (which provided information for FirstClass Phone Cards; Retail *Merchandise*; *PostOffice Online*; *LibertyCash*; *Dinero Seguro*; REMITCO; and Sure Money), with additional columns for all quarters since the period included in the "FY 2001" column, through the most recent quarter.

a. Provide a detailed description of each service listed in the Attachment.
b. For each service, state whether or not it is provided, in whole or in part, based on a strategic alliance or contract between the Postal Service and one or more parties.
c. For each service based on a strategic alliance or contract between the Postal Service and one or more parties, list all of the strategic allies and/or parties to the contract.
d. On what date was this service first offered to the public?
e. Is this service still available to the public? If not, when was the service discontinued? State the reasons for discontinuing the service.
f. Provide a description of the primary purchasers of the service.
g. Provide a complete description of the activities performed by the Postal Service in providing the service.
h. Explain how the service is sold, e.g., over the internet, in postal facilities, or in private facilities, etc.
i. Submit each rate/fee schedule for all rates or fees charged to purchasers since the service was first made available to the public. If the rate/fee schedule has changed from time to time, then provide each rate/fee schedule and the date it was changed.
j. Submit all of the annual, accrued direct and indirect costs, separately identified, to provide the service, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, and costs associated with each service that has been terminated or discontinued.
k. Submit all of the annual revenues earned by the Postal Service in providing the service.
l. Submit annual volume figures for each service, by billing determinant.
m. Submit annual net income (loss) figures for the service since the service was first made available to the public.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

n. Submit total revenues for the service for the entire period since the service was first made available to the public.
o. Submit total costs (both start-up and operating) for the entire period since the service was first made available to the public.
p. Submit total net income (loss) figures for the service since the service was first made available to the public.
q. Give a precise citation in the current filing for every figure submitted in parts j. – p.
r. For calculations and figures not already included in the current rate case, provide all worksheets (whether hardcopy or electronic), computations, and underlying source materials.
s. Give a precise, detailed written description of how costs that are joint or common to (1) DMCS services and (2) services listed in Attachment 1 have been allocated to the (1) DMCS group and (2) the Attachment 1 group. Give all underlying accounting records, other records, worksheets, calculations, and computations that show the allocation process, including citations to the current rate case filing. If the Postal Service does not make such an allocation, explain why not.
t. Attachment 1, as filed on December 17, 2001, appears to have an addition error for LibertyCash, in the line for "Cumulative Balance", and the column "Since Inception." OCA calculates the Cumulative Balance Since Inception at $4,246,492. If, indeed, an incorrect figure was included in the Attachment to interrogatory 240, then please use a corrected figure in responding to the instant interrogatory.

RESPONSE:

A partial objection was filed on May 23, 2005. See, however, the attachments provided in response to OCA/USPS-53, which include updated information on all of the services mentioned in this question except REMITCO, which ceased operations before the base year in the last omnibus rate proceeding. With respect to the last subpart, regarding the cumulative balance for (now terminated) LibertyCash, the Postal Service has no greater information to bring to

bear than does the OCA, although it certainly appears that the referenced figure was incorrect, and the alternative figure suggested in the question seems likely to be the correct one.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

OCA/USPS-53. Please refer to Attachment F of the Request, at pages 14 -15. There are 5 unnumbered paragraphs on these pages. For nonpostal services involving window clerk activity (unnumbered paragraph 3), provide all calculations, worksheets, and primary sources for the total expense figure of $123 million in FY04.

a. Please provide the IOCS questions that separately identify "nonpostal" services.
b. Include all of the accounting expense data referred to in unnumbered paragraph 3.
c. Display data separately for each discrete "nonpostal" service and show how they sum to the $123 million total.
d. Separately identify development costs for each "nonpostal" service and in total.
e. Separately identify start-up costs for each "nonpostal" service and in total.
f. Separately identify capital costs for each "nonpostal" service and in total.
g. Separately identify common and joint costs for each "nonpostal" service and in total. Include all calculations, worksheets, and primary sources for the allocation of joint and common costs between DMCS services and "nonpostal" services.
h. Separately identify costs associated with each "nonpostal" service that has been terminated or discontinued and in total.
i. For nonpostal services involving window clerk activity, provide all calculations, worksheets, and primary sources for the total revenue figure of $239 million in FY04.
j. Provide all comparable data requested in this interrogatory, including parts a. – i., for Fiscal Years 2001, 2002, 2003, and the most recent quarters of 2005.
k. Provide test year estimates, i.e., FY2006, by discrete "nonpostal" service and in total, for expenses and revenues. Explicitly state all assumptions made in developing these estimates. Provide all calculations, worksheets, and primary sources used to develop the estimates.

RESPONSE:

Partial objection filed on May 23, 2205. See Attachments One and Two to this

response. Attachment One provides breakouts by product for FY04, and, to the extent that information is available for the same products, FY03 and FY02. The figures for FY04 yield the FY04 subtotals provided on pages 14-15 of Attachment F to the Request with respect to window clerk programs and nonwindow clerk programs. Please note that for FY02 and FY03, years prior to the base year in this proceeding, any totals or subtotals shown in Attachment One pertain only to those programs for which base year information is provided, and are not comprehensive totals to the extent that programs which did not continue into the base year have not been included, even if they had minor activity in FY02 and FY03. Note that Dinero Seguro/Sure Money was not included in the figures provided in Attachment F to the Request, because it is an international service, and is included in Attachment One only in response to the specific request in OCA/USPS-52 for update of a set of programs which included Dinero Seguro. Attachment Two provides program descriptions and related information for the rows in Attachment One.

a. To produce cost data for nonpostal and other services involving window clerk activity, Question 18F, Part 2, of the IOCS survey asks data collectors to "enter the one activity that best describes the window service employee's activity at the time of the reading." They are asked to choose from a list of thirty-one activities, five of which are nonpostal services. The nonpostal services on the list to choose from are U.S. Passport applications, Retail Products, Migratory Bird Stamps, Phonecards and Selective Service Registration. The tallies recorded by the data collector for nonpostal activities are merged with all of the tallies in the

IOCS database and the total number of tallies for each of the window activities is produced. These tallies represent the proportion of window clerk labor time spent on each of the services nationally and direct window clerk labor costs are divided up according to these time proportions for each product or service.

Added to direct labor costs for each service are window clerk time waiting for a customer, break time, moving empty equipment, clocking in and out, and piggyback costs. Piggyback costs at the window are such things as service-wide benefits, supervisor costs, general office and clerical, cleaning and protection, plant and maintenance, rents, fuel and utilities, custodial supplies and services, and building and lease depreciation and interest expense, all of which vary with the volume of service at the window.

k. Test Year revenue for nonpostal products is included in Other Income on line 13 of Witness Tayman's Exhibit USPS-6D. The explanation of how Other Income is forecasted is provided in Chapter X.e at pages 443-45 of USPS-LR-K-50. As review of those pages shows, forecasts for nonpostal products are not made on a product-level basis, except for FedEx boxes, which are the only item included in the "Retail Alliances" line under Other Income. Essentially, in the aggregate, these revenues are forecasted as an average of previous aggregate revenues.

Attachment One
Response of the United States Postal Service to OCA/USPS 53

FY 2004 NONPOSTAL PRODUCTS ($000)

Product			FY 2002	FY 2003	FY 2004
Migratory Bird		Revenue	N/A	N/A	182
		Expenses	N/A	N/A	1,237
		Net Income (Loss)	N/A	N/A	(1,055)
Passports		Revenue	48,865	86,257	124,723
		Expenses	43,392	38,722	37,155
		Net Income (Loss)	5,473	47,535	87,568
Phone Cards		Revenue	9,314	5,099	8,101
		Expenses	5,503	1,046	1,215
		Net Income (Loss)	3,811	4,053	6,886
Retail	1/	Revenue	83,588	92,292	105,965
		Expenses	45,926	54,643	83,468
		Net Income (Loss)	37,662	37,649	22,517
Selective Service		*Revenue*	N/A	N/A	0
		Expenses	N/A	N/A	153
		Net Income (Loss)	N/A	N/A	(153)
WINDOW SUBTOTAL		Revenue	141,767	183,648	**238,991**
		Expenses	94,821	94,411	**123,228**
		Net Income (Loss)	46,946	89,237	**115,763**
AOL CD Program		Revenue	Not Started	4,759	7,687
		Expenses	Not Started		0
		Net Income (Loss)	0	4,759	7,687
FedEx Dropboxes		Revenue	20,716	26,721	20,246
		Expenses			0
		Net Income (Loss)	20,716	26,721	20,246
Meter Manufacturers Program		Revenue	Not Started	N/A	173
		Expenses	Not Started	N/A	0
		Net Income (Loss)	0	0	173
Affiliates & Alliances		Revenue	N/A	N/A	42
		Expenses	N/A	N/A	55
		Net Income (Loss)	0	0	(13)
Collaborative Logistics		Revenue	Not Started	834	567
		Expenses	Not Started	50	0
		Net Income (Loss)	0	784	567
Magazine Subscriptions		Revenue	Not Started	N/A	40
		Expenses	Not Started	N/A	532
		Net Income (Loss)	0	0	(492)
Electronic Payment	2/	Revenue	1,676	373	225
		Expenses	3,154	66	15
		Net Income (Loss)	(1,478)	307	210
Electronic Postmark (EPM)		Revenue	113	98	75
		Expenses	1,804	80	301
		Net Income (Loss)	(1,691)	(482)	(226)
Imagitas		Revenue	3,550	6,311	9,870
		Expenses	7,120	532	1,370
		Net Income (Loss)	3,430	5,779	8,500
Liberty Cash	3/	Revenue			0
		Expenses	317	220	6
		Net Income (Loss)	(317)	(220)	(6)
Licensing Programs		Revenue	N/A	N/A	2,717
		Expenses	N/A	N/A	2,672
		Net Income (Loss)	0	0	45
Mailing Online		Revenue	1,880	3,903	1,182
		Expenses	12,521	13,063	906
		Net Income (Loss)	(10,641)	(9,160)	276
NetPost Certified Mail	4/	Revenue	0	116	41
		Expenses		0	0
		Net Income (Loss)	0	116	41
NetPost Cardstore	5/	Revenue	25	24	65
		Expenses			11
		Net Income (Loss)	25	24	54
Postmark America	6/	Revenue	1,413	1,568	904
		Expenses	1,551	1,819	814
		Net Income (Loss)	(138)	(251)	90
NONWINDOW SUBTOTAL		Revenue	29,373	44,683	**43,834**
		Expenses	21,467	16,330	**6,682**
		Net Income (Loss)	7,906	28,353	**37,152**
Dinero Seguro/Sure Money	7/	*Revenue*	3,274	2,336	2,167
		Expenses	6,092	6,109	1,280
		Net Income (Loss)	(3,018)	(3,773)	887

1/ Includes Retail and ReadyPost
2/ Terminated April 04
3/ Terminated Sept 03
4/ Terminated April 04. FY02 Rev & Exp reported in Mailing Online. FY03 Exp reported in Mailing Online
5/ FY02 & FY03: Exp reported in Mailing Online
6/ Store closed May 04
7/ International

ATTACHMENT TWO TO RESPONSE TO OCA/USPS-53

MIGRATORY BIRD STAMPS

This program is the result of an agreement between the Postal Service and the United States Fish and Wildlife Service governing the responsibilities of each agency to the other in connection with the administration of the Migratory Bird Hunting and Conservation Stamp (Duck Stamp) Program. The agreement pertains specifically to the distribution and sale of the Duck Stamp to the general public through Postal Service retail outlets. The primary customers are wildlife hunters and stamp collectors.

PASSPORTS

Passport Applications is a partnership with the US Department of State. In compliance with a Memorandum of Understanding between the agencies, the Postal Service receives a fee for processing new Passport Applications. A passport application, form DS-11, is completed by a postal customer and presented at the retail unit at one of our designated passport acceptance locations. The form is reviewed for completeness and an ID is verified. The completed application is sent to a specific Department of State address for processing. The retail unit charges two fees for the application, one for the Postal Service and one for the Department of State. The Department of State fee is forwarded to their bank. In some retail locations, the Postal Service also offers customers the ability to obtain passport photos for an additional fee.

PHONE CARDS

This is program involving pre-paid cards bearing philatelic images, sold at post office retail counters and in vending machines. They enable users to place domestic and international phone calls up to the value of the card. The Postal Service and its long-distance telephone service alliance partner (AT&T) share revenue. The primary purchasers of the service are retail customers who purchase as a gift or on an impulse, or travelers without access to cell or land phones. Phone cards are placed on consignment by the vendor until sold over the counter, at which point they are activated and funds are remitted to the vendor. Vending machine cards are batch activated prior to placing into the machine.

READYPOST®

ReadyPost® is a USPS-branded line of decorative and generic shipping supplies designed for sale in postal retail locations to support mailing needs of our customers. The products (boxes, padded mailers, bubble mailers, envelopes,

mailing labels, bubble wrap, etc.) support the core business and the designs are unique to the USPS. The program provides added convenience for customers with one-stop shopping for packaging and mailing items. The program is based on a contract with Hallmark Custom Marketing, Inc. Primary customers are retail customers mailing packages or correspondence who require packaging materials to facilitate the mailing process. Packaging would include decorative products required by some customers for special occasion mailings. Customers may use the products as part of a mailing at the time of purchase, or retain them for future use.

The IOCS does not distinguish between ReadyPost activity and activity relating to other retail merchandise. Therefore, using expense figures which include IOCS costs, it is not possible to disaggregate between ReadyPost and other retail merchandise, and the expenses and revenues have thus been combined under Retail in Attachment One to the response to OCA/USPS-53. Revenue figures (in $000) for ReadyPost by itself, however, were $70,300 in FY02, $80,870 in FY03, and $90,636 in FY04.

RETAIL

This program provides for the sale of licensed retail merchandise in post offices. Licensees utilize postal trademarks and stamp images to develop products that can be displayed in offices. Four seasonal catalogs of products are developed and mailed to Postmasters/station managers so that they may select product for resale in their offices. OLRP products are currently produced by fourteen participating licensees. Licensees periodically change due to adding and deleting of licensees. Postal retail customers purchase these products on display in the retail units, and they are usually gift items that represent convenience purchases. These items are individually ordered by each retail unit and displayed in the retail lobby for resale. The items are purchased over the counter. As noted above, revenue and expenses for this program and ReadyPost have been combined in Attachment One. Separate revenues for this program (in $000) were $13,288 in FY02, $11,422 in FY03, and $15,349 in FY04.

SELECTIVE SERVICE

The Postal Service has agreed with the Selective Service to make its brochures available in postal retail lobbies. The brochures are free and available to any individual desiring to register with Selective Service. Brochures are completed by the individual registering and presented to the retail associate for verification of identification. The brochure is then mailed to the Selective Service agency by the retail unit. There is no fee associated with this service.

ATTACHMENT TWO TO RESPONSE TO OCA/USPS-53

AOL CD PROGRAM

The Postal Service has allowed America Online (AOL) to place one take-one CD display in up to 13,842 lobbies. In exchange for marketing through postal retail outlets, AOL pays the Postal Service a fixed fee for retail space, and provides the Postal Service with up to 100MB of space on the registration CDs distributed through post offices. Postal Service branding appears on the AOL welcome screen as part of the registration process; and AOL subscribers are given the opportunity to link to and register for Postal Service services through USPS.com. The Postal Service logo also appears on the AOL web-browser with a direct link to the USPS.com home page. This provides the Postal Service with exposure to all new AOL customers acquired through postal outlets. Additionally, a Click-N-Ship tutorial and shortcut, is downloadable to the computer desktops of customers that register for the AOL free trial using AOL discs distributed through postal outlets. The AOL discs also include information on carrier pickup, calculating postage, Zip Code lookup, free shipping supplies, postal locator and ordering stamps online. Under the agreement, AOL is responsible for installing and restocking the take-one CD displays. The Postal Service provides no services in connection with these take-one CD displays. AOL is responsible for installation, CD replenishment, and removal of displays and CDs. The agreement, currently in negotiation, will be modified in June 2005 to reduce the number of participating locations.

FEDEX DROPBOXES

As part of a non-exclusive contract between FedEx and the Postal Service, FedEx pays fees to the Postal Service to allow it to locate its express drop boxes outside or in proximity to post offices. These fees are based on the number of boxes installed, FedEx package volume growth, and package type. FedEx boxes are currently installed at about 5,000 post offices. The Postal Service provides no services in connection with these drop boxes. All responsibilities related to installation, maintenance, collection, and removal are FedEx's.

METER MANUFACTURERS MARKETING PROGRAM

Pitney Bowes and the Postal Service entered into a non-exclusive test-marketing relationship whereby the Postal Service would make available certain retail space for the test marketing of PB postage meters and scales in selected lobbies through the use of marketing and/or promotional materials including written promotional marketing materials displayed in an exhibit. The purpose of the test is to determine the economic and practical feasibility of a longer term marketing relationship for the marketing of PB products in Post Office retail lobbies. Brochures are displayed as free "take-ones".

ATTACHMENT TWO TO RESPONSE TO OCA/USPS-53

AFFILIATES AND ALLIANCES

Creating an Affiliate Relationship is a method for acquiring or exchanging products or services, or creating a revenue stream. Affiliate relationships are generally established for the purposes of generating visitor traffic, making purchases, or completing transactions between two websites. These agreements are usually based on a pay-for-performance model which is measured by number of clicks, registrations, sales or any combination of the above. Affiliates that do not generate revenue are referred to as linking agreements.

Today, we limit consideration of Affiliates to those that complement our core product offering, generate mail, and/or provide value to our customers. These relationships are solidified through an Affiliate Agreement between the Postal Service and our business affiliate. The Postal Service has more than 75 linking agreements with companies, such as the PC Postage Vendors and other government agencies. Additionally, there are several revenue generating affiliate agreements.

COLLOBORATIVE LOGISTICS

The Postal Service contracts annually for $2.4 billion in highway contracts for mail transportation between hundreds of plants, air mail centers, bulk mail centers, and hub and spoke centers in our network. Utilization of these vehicles varies by day of the week, time of the month, and season of the year. We have strategic efforts underway aimed at optimizing the facilities and the transportation system serving those nodes. However, due to the natural imbalances of mail volume between cities, we know that there will still be underutilized space on some contracted highway transportation. Under a program called Collaborative Logistics, we sell underutilized longhaul space to shippers desiring to move non-mail items (i.e., items which will not subsequently enter the mailstream). Space has been sold to any party who meets our criteria. Written agreements are lane specific, and may be ended at either party's wish. We have sold space primarily back to our highway contractors, and freight brokers. Our core business rules for the test precluded selling space where it could impact mail security or service. Long haul trips were chosen exclusively, more than 4 hours in each direction. We chose direct trips only, so there were no complications of having to offload mail at intermediate points. One of the major benefits of this program has been that, in the course of attempting to identify available space, opportunities to adjust purchased transportation contracts to save costs have been identified and implemented. These improvements, however, have also reduced the scope of the Collaborative Logistics program. There are currently no lanes being sold, no active agreements, and no strategic alliances.

ATTACHMENT TWO TO RESPONSE TO OCA/USPS-53

MAGAZINE SUBSCRIPTIONS

This is a service provided by Affiliate Agreement with Magazine Mall. Through it, consumers and small to medium sized businesses are able to access and order magazine subscriptions from www.usps.com. Customers are able to receive up to 85 percent off of the regular retail price. Service is sold and accessed through www.usps.com. In Attachment One, it seems that expenses unrelated to this program have for some reason substantially inflated the amount that should appear in its accounts. The true expenses of the Magazine Subscription program for FY04 are estimated at $32,000.

ELECTRONIC PAYMENT

The USPS Online Payment Service, also known as USPS eBillPay, was an online service for bill payment. The service was offered through a strategic alliance with CheckFree Corporation. It was discontinued on May 1, 2004. The market as a whole did not grow as quickly as expected. New entrants, such as banks which were unwilling to join the market when the Postal Service became involved, subsequently entered, and the service was not meeting the expectations of the Postal Service. The Postal Service provided the online website and branding for the service, which was sold online through usps.com.

ELECTRONIC POSTMARK (EPM)

The USPS Electronic Postmark (EPM) is an out-sourced all-electronic service giving customers a way to time-stamp electronic files. The EPM provides evidence that a document or file existed at a specific time and date and detects changes made to the postmarked document. Since January of 2003, the service has been performed entirely by an outside vendor, Authentidate, under postal direction, policies, and branding. The Postal Service shares a portion of the EPM fees collected. Enrollment, payment, software installation and use are all web-based. Fees are on a per transaction basis. The primary uses are for time date stamp integrity authentication of faxed doctor's orders and end user documents, such as contracts or patient notes. The role of the Postal Service is to set policy, establish pricing, and perform security certification of any software that is USPS branded. The service is sold over the internet via online sales, or via a hardcopy sales agreement.

ATTACHMENT TWO TO RESPONSE TO OCA/USPS-53

IMAGITAS (MoverSource)

The MoverSource is a strategic alliance agreement between the Postal Service and Imagitas, which recently became a wholly-owned subsidiary of Pitney Bowes, Inc. Roughly 17 percent of the American population moves each year, and every year the Postal Service processes an average of 44 million change-of-address orders. Managing this process is a large and costly undertaking. In 1995, the Postal Service and Imagitas formed a strategic alliance to improve the accessibility and convenience of change of address service, and to help defray Postal Service costs. The following services are provided under the strategic alliance:

The Mover's Guide – A package that includes PS Form 3575, Change of Address Order, and PS Form 3576, Change of Address Request for Correspondents, Publishers, and Businesses; move-related tips;, and advertisements for move-related products and services.

Welcome Kit – An envelope sent to movers that contains the official USPS Confirmation Notification Letter (CNL) sent to the new address of COA filers, along with information about the mover's new community and move-related advertising.

MoversGuide Online (MGO) - This site, located on usps.com, allows a mover to file an electronic COA order online. Similar to the hardcopy Mover's Guide, the online version provides move-related savings, tips and information.

Overall, the MoverSource alliance helps the Postal Service avoid costs associated with distributing change of address materials and operating the change of address feature on usps.com. It does so by allowing Imagitas to sell advertising contained in those materials and presented on the MoversGuide Online site of usps.com. Purchasers of advertising in MoverSource products are targeting movers to promote products and services in approved move-related advertising categories. Several large (Fortune 500) firms advertise with the MoverSource, including JC Penny, Home Depot, and Ford. The Postal Service provides no activities under the MoverSource alliance beyond those it already provides to offer change of address services. All MoverSource materials are produced by Imagitas and all advertising services are provided by Imagitas. MoverSource products feature category-exclusive advertising opportunities for potential sponsors.

ATTACHMENT TWO TO RESPONSE TO OCA/USPS-53

LIBERTY CASH

The Liberty Cash Program was a stored value card program that was terminated two years ago. The card could be loaded up to $300 and was piloted in ten districts. There was no retail fee for issuance and therefore no retail revenue realized. The only active portion of the program is now limited to issuing customer refunds of leftover customer balances. The card allowed customers to place advance deposits with the Postal Service and to draw down those balances to make postal purchases. This provided utility to business customers who wanted to limit credit purchases to postal products without providing a standard credit card to their employees. The basis for the service was a contract with Bank of America, with FDMS as the subcontractor. The primary purchasers were small business and home based businesses, who purchased the card over the retail counter. The card was initially opened with a deposit from the customer. Account setup was accomplished in the POS unit. Deposits would increase the stored value of the card, while purchases over the counter would decrease the stored value.

LICENSING PROGRAMS

The United States Postal Service Licensing Program generates revenue through the licensed use of intellectual property either wholly or jointly owned by the Postal Service. Such intellectual property includes stamp images, copyrighted material, the Postal Service corporate signature, other trademarks, service marks and trade dress. Licensees can pay specific fees for usage, but in most cases pay a royalty for each item that contains Postal Service intellectual property. Property containing Postal Service intellectual property is sold in various marketplaces and territories, which in some cases includes sales in Postal Service retail locations through the Official Licensed Retail Product Program (OLRP). ORLP consolidates all products of official USPS licensees that can be sold in retail locations in an annual catalog, which local postmasters can order from. Products are also sold through the Postal Store on usps.com. In most cases, the Postal Service receives a royalty credited to the Licensing Program regardless of where or how the product is sold, and Retail separately receives credit for the markup between the wholesale and retail price of the various products sold through the program at Postal Service retail locations.

MAILING ONLINE

NetPost Mailing Online is an electronic-to-hardcopy printing and mailing service. Services are provided by PosteDigital. Customers are able to create, print and access First-Class, Standard, Non-profit, and G-10 mailings via the Postal Service's corporate web site, www.usps.com. The service is not provided by the Postal Service, but is accessed through www.usps.com.

ATTACHMENT TWO TO RESPONSE TO OCA/USPS-53

NETPOST CERTIFIED MAIL

NetPost Certified Mail allowed customers to create a document on a computer and transmit it electronically through usps.com along with the mailing list. The service then verified the mailing addresses, added the appropriate barcode, printed and folded the letter, and completed the certification forms electronically. This program was terminated in April 2004. The primary purchasers of the service were small to large businesses. The role of the Postal Service was program management/development of service and new enhancements.

NETPOST CARDSTORE

NetPost Card Store allows customers to create high-quality, personalized greeting cards that are printed and mailed the next business day. Customers may also choose to insert a retail gift card inside their greeting card and schedule the date and time they would like it to be printed and mailed. Services are provided by Touchpoint Inc. The primary purchasers of the service are consumers, and small to medium sized businesses. The role of the Postal Service is program management/development of service and new enhancements. Service is not provided by the Postal Service, but is accessed through www.usps.com.

POSTMARK AMERICA

The Postmark America store was a unique Post Office located in the "Mall of America" in the Northland District providing core mailing services and postal related merchandise and apparel. The store was a model unit and test site for evaluating new retail solutions. It supported Retail access and the revenue goals of all core products, including stamps for correspondence and transactions, domestic and international packages services, extra services, ad mail and packaging products, retail merchandise, phone cards, and money orders. Shoppers at the Mall of America were offered merchandise presented in a Post Office Express unit environment as retail merchandise for sale. The Postmark America store closed on April 25, 2004, as it was not meeting its financial targets.

DINERO SEGURO/SURE MONEY

Sure Money is the umbrella title for the Postal Service's international funds transfer service offered through 2,800 postal retail units with high concentration of Hispanic immigrants. The service is branded Dinero Seguro at retail, and provides service to 10 countries in Latin American and Caribbean. It operates

ATTACHMENT TWO TO RESPONSE TO OCA/USPS-53

through a strategic alliance with Bancomer Transfer Service. Primary users are retail customers who are immigrants of the countries served by the service. The Postal Service collects the name of the recipient and sender, the amount of funds to be sent; the funds and service fee; and provides the data to Bancomer Transfer Service to complete the transaction. The service fee and the foreign exchange amount (to convert dollar-denominated funds into local currency) are combined and shared between the Postal Service and Bancomer Transfer Service.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OCA

OCA/USPS-54. For nonpostal services with no associated window clerk activity (unnumbered paragraph 4), provide all calculations, worksheets, and primary sources for the total expense figure of $7 million in FY04.

a. Include all of the accounting expense data referred to in unnumbered paragraph 4.
b. Display data separately for each discrete "nonpostal" service and show how they sum to the $7 million total.
c. Separately identify development costs for each "nonpostal" service and in total.
d. Separately identify start-up costs for each "nonpostal" service and in total.
e. Separately identify capital costs for each "nonpostal" service and in total.
f. Separately identify common and joint costs for each "nonpostal" service and in total. Include all calculations, worksheets, and primary sources for the allocation of joint and common costs between DMCS and "nonpostal" services.
g. Separately identify costs associated with each "nonpostal" service that has been terminated or discontinued and in total.
h. For nonpostal services with no associated window clerk activity, provide all calculations, worksheets, and primary sources for the total revenue figure of $44 million in FY04.
i. Provide all comparable data requested in this interrogatory, including parts a. – i., for Fiscal Years 2001, 2002, 2003, and the most recent quarters of 2005.
j. Provide test year estimates, i.e., FY2006, by discrete "nonpostal" service and in total, for expenses and revenues. Explicitly state all assumptions made in developing these estimates. Provide all calculations, worksheets, and primary sources used to develop the estimates.

RESPONSE:

Partial objection filed on May 23, 2205. See Attachments One and Two to the response to OCA/USPS-53.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-55

What measures will the USPS put in place to facilitate the purchase of the proposed single piece First-Class stamps so that:

a. The wait time in postal lines is reduced, and

b. Sufficient single piece First-Class stamps will be available when the new rates go into effect.

RESPONSE

a-b. The Postal Service has not yet begun the process of determining what steps it may take to facilitate retail purchase of postage stamps implementing rate changes that may come from this docket.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-56

Upon implementation of the proposed Docket No. R2005-1 rates, what type of "grace" period does the Postal Service offer its customers prior to returning a mail piece for insufficient postage?

RESPONSE:

Please see the response to OCA/USPS-55. As a matter of policy, the Postal Service typically offers no grace period.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-57

If the proposed Docket No. R2005-1 rate change is implemented on a Sunday, and a customer deposits mail into a USPS mail receptacle on that same Sunday using the former postage rate,

a. Is the mail piece going to be processed and delivered to its destination? If not, please explain fully.

b. Is the mail piece going to be returned to the originator? If your response to this interrogatory is affirmative, please provide the USPS's average cost to return to the originator of the mail piece for insufficient postage: (1) a First-Class letter and (2) a First-Class parcel weighing 13 ounces or less.

RESPONSE:

a. Yes. Relative to other days of the week, much less mail is deposited in USPS collection boxes on Sundays. Scheduled Sunday collection is very rare. Otherwise, Sunday collection can occur in the unusual circumstances when a box is observed on that day to be overflowing. When Sunday collection occurs, or on the occasion of the first scheduled collection on the Monday following a Sunday rate change, it is usually not possible to tell whether the letters in the box were deposited before or after the rate change took effect. Some or all could have been deposited after the last pickup before Sunday. Accordingly, the letters are treated as if they were deposited before the change took effect.

b. See the response to part (a).

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-58

As noted in Docket No. C2001-3, the USPS downgraded several First-Class Mail Zip Code pairs from 2 day delivery to 3 day delivery.

a. Subsequent to 2001, has the USPS conducted any transportation cost studies to evaluate the savings resulting from those down grades? If so, please provide copies of those studies. If not, please explain fully why no analysis has been performed.

b. Subsequent to 2001, has the USPS analyzed the consistency with which deliveries are made to those areas that were downgraded? If so, please provide copies of those studies. If not, please explain fully why no analysis has been performed.

RESPONSE:

a. No. Since cost savings were not a motivation for the changes, the Postal Service has not sought to study what their cost impact may have been.

b. No analysis has been performed. Attention has been focused on other projects.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-59

In previous dockets including Docket No. C2001-3, the USPS indicated that in 2000 and 2001 there was a shift away from air transportation to ground transportation.

a. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus using ground transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

b. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for transporting First-Class Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

c. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for transporting Priority Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

d. Has the USPS conducted any studies or analysis of the cost benefit of using air transportation versus ground transportation for transporting Express Mail? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

e. Has the USPS conducted any studies or analysis of the average pound-mile cost of transporting mail by air transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

f. Has the USPS conducted any studies or analysis of the average pound-mile cost of transporting mail by ground transportation? If so, please provide copies of those studies and/or analyses. If no, please explain fully why no study or analysis has been performed.

RESPONSE:

a. The Postal Service understands this question as requesting any studies or analyses of the overall cost benefits of using air transportation versus ground transportation. As such, the answer is no. The Postal Service considers it obvious that, in general, air transportation has advantages over ground transportation in areas of speed, and ground transportation has advantages over air transportation in areas of cost. The Postal Service has conducted some

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

specific analyses, which it considers to be highly commercially sensitive, in regard to specific origin-destination city pairs.

RESPONSE to OCA/USPS-59 (continued):

b-d. Please see response to (a), above.

e. The Postal Service understands this question as requesting any studies or analyses of the overall average pound-mile cost of transporting mail by air transportation. As such, the answer is no. Many air transportation expenses are not based on pound miles. For example, the relevant costs for mail that is flown on FedEx are not based on pound miles. Transportation charges for mail that is flown within Alaska are set by the Department of Transportation. The Postal Service has conducted some specific analyses, which it considers to be highly commercially sensitive, in regard to specific origin-destination city pairs that are flown on air other than FedEx.

f. No. The Postal Service has not, to this date, concluded that attempting to gather the data that would be necessary to complete a valid study or analysis of the average pound-mile cost of transporting mail by ground transportation would be an optimal use of its resources.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUNER ADVOCATE

OCA/USPS-60 For each of the past three years and for each category or type of (a) Express Mail, (b) Priority Mail (c) Package Services and (d) First-Class single piece letters, please provide nationwide data from ODIS (Origin-Destination Information System), EMRS (Electronic Marketing Reporting System), EXFC (External First-Class (Mail system)) and any other applicable data systems showing the volume of mail delivered after the number of days specified by the applicable service standard. Please provide the frequency – volume, percentage and average – for mail delivered within one to fifteen days after the applicable service standard, broken out for each of the fifteen days. In your response, please include the full calculation for each figure requested, including a description of each figure used in the calculation. Please provide cites to source documents for all figures presented in calculations and provide copies of any documents that have not been previously filed in this docket. (For reference purposes, please refer to Docket No. R2001-1, OCA/USPS-103.)

RESPONSE:

a. Objection filed.

b. See attached. Note: PETE does not measure 3-day service standard Priority Mail. [*** Attached as OCA-60b.xls***]

c. Objection filed.

d. [***Attached as OCA 60d.xls***]

Response to OCA/USPS-60(b)
FY 2002 Priority Mail Days to Delivery
Source: ODIS-RPW

PERCENT DELIVERED IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	81	95	97	98	99
TWO-DAY	10	67	86	94	97
THREE-DAY	3	32	60	76	85

PERCENT DELIVERED IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	99	99	100	100	100
TWO-DAY	98	99	99	100	100
THREE-DAY	90	93	95	97	98

PERCENT DELIVERED IN 11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	100	100	100	100	100
THREE-DAY	99	99	99	99	100

Response to OCA/USPS-60(b)
FY 2002 Priority Mail Days to Delivery
Source: ODIS-RPW

	KNOWN DELIVERY	DAYS VOLUME				
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	152,524,835	124,185,758	144,232,977	148,212,877	150,056,503	150,755,455
TWO-DAY	598,400,637	57,751,243	400,145,184	514,863,777	559,625,691	578,244,423
THREE-DAY	33,964,611	933,328	10,796,597	20,369,895	25,735,342	28,756,172

	KNOWN DELIVERY	DAYS VOLUME				
		6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		151,370,945	151,701,750	151,859,770	152,012,989	152,106,857
TWO-DAY		587,015,187	591,256,532	594,188,112	595,746,902	596,486,615
THREE-DAY		30,561,680	31,522,042	32,426,342	32,990,587	33,295,922

	KNOWN DELIVERY	DAYS VOLUME				
		11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		152,163,917	152,194,867	152,297,956	152,318,610	152,337,545
TWO-DAY		596,999,740	597,325,220	597,554,985	597,724,401	597,940,864
THREE-DAY		33,458,940	33,594,773	33,684,660	33,735,715	33,795,104

Response to OCA/USPS-60(b)
FY 2003 Priority Mail Days to Delivery
Source: ODIS-RPW

PERCENT DELIVERED IN 1 DAY		2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	84	96	98	99	99
TWO-DAY	12	79	93	97	99
THREE-DAY	3	42	74	88	94

PERCENT DELIVERED IN 6 DAYS		7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	99	100	100	100	100
THREE-DAY	97	98	99	99	99

PERCENT DELIVERED IN 11 DAYS		12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	100	100	100	100	100
THREE-DAY	100	100	100	100	100

Response to OCA/USPS-60(b)
FY 2003 Priority Mail Days to Delivery
Source: ODIS-RPW

	KNOWN DELIVERY TOTAL	DAYS VOLUME 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	147,449,025	123,700,946	140,933,828	144,117,091	145,555,777	146,392,341
TWO-DAY	547,235,884	63,867,536	433,282,790	510,276,349	531,974,617	540,025,398
THREE-DAY	31,223,673	1,042,186	13,269,197	22,962,415	27,503,642	29,451,411

	KNOWN DELIVERY	DAYS VOLUME 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		146,741,525	146,923,265	147,056,631	147,184,781	147,231,557
TWO-DAY		543,367,252	544,752,980	545,735,226	546,229,010	546,462,683
THREE-DAY		30,335,346	30,705,732	30,910,461	31,005,550	31,058,709

	KNOWN DELIVERY	DAYS VOLUME 11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		147,259,905	147,277,533	147,293,277	147,323,469	147,338,187
TWO-DAY		546,632,956	546,782,711	546,872,781	546,933,305	546,981,120
THREE-DAY		31,091,208	31,123,750	31,146,077	31,156,246	31,164,546

Response to OCA/USPS-60(b)
FY 2003 Priority Mail Days to Delivery
Source: ODIS-RPW

PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	84	96	97	99	99
TWO-DAY	12	79	93	97	99
THREE-DAY	4	40	72	87	94

PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	99	100	100	100	100
TWO-DAY	99	99	100	100	100
THREE-DAY	97	98	99	99	100

PERCENT DELIVERED	IN 11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	100	100	100	100	100
THREE-DAY	100	100	100	100	100

Response to OCA/USPS-60(b)
FY 2003 Priority Mail Days to Delivery
Source: ODIS-RPW

	KNOWN DELIVERY DAYS VOLUME					
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	141,293,024	118,365,810	135,122,321	137,732,472	139,360,005	140,119,340
TWO-DAY	507,693,065	60,789,282	401,987,563	471,501,588	492,143,352	500,128,840
THREE-DAY	28,237,712	993,923	11,426,601	20,196,235	24,613,448	26,511,457

	KNOWN DELIVERY DAYS VOLUME				
	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	140,428,879	140,655,857	140,841,192	140,942,859	141,007,410
TWO-DAY	503,626,852	505,070,493	506,022,386	506,662,698	507,016,653
THREE-DAY	27,351,534	27,745,415	27,941,587	28,068,930	28,104,355

	KNOWN DELIVERY DAYS VOLUME				
	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	141,029,850	141,076,993	141,114,783	141,146,344	141,180,753
TWO-DAY	507,189,742	507,288,544	507,369,038	507,415,883	507,466,781
THREE-DAY	28,137,169	28,159,990	28,170,436	28,177,040	28,188,185

Response to OCA/USPS-60(b)
FY 2001, FY 2002, FY 2003 Priority Mail Days to Delivery
Source: PETE

Priority Mail End-to-End Measurement System															
FY 2002	Percent Delivered Within														
Service Standard	1 day	2 days	3 days	4 days	5 days	6 days	7 days	8 days	9 days	10 days	11 days	12 days	13 days	14 days	15 days
Overnight	89.98	97.16	98.95	99.59	99.82	99.87	99.92	99.94	99.95	99.95	99.96	99.97	99.98	99.98	99.98
Two Day	12.73	74.93	89.63	95.46	97.95	99.01	99.43	99.70	99.82	99.89	99.93	99.95	99.97	99.98	99.98
FY 2003	Percent Delivered Within														
Service Standard	1 day	2 days	3 days	4 days	5 days	6 days	7 days	8 days	9 days	10 days	11 days	12 days	13 days	14 days	15 days
Overnight	92.21	97.86	99.22	99.70	99.87	99.94	99.97	99.98	99.98	99.99	99.99	99.99	100.00	100.00	100.00
Two Day	14.34	87.64	95.86	98.64	99.52	99.79	99.88	99.92	99.95	99.96	99.97	99.98	99.98	99.99	99.99
FY 2004	Percent Delivered Within														
Service Standard	1 day	2 days	3 days	4 days	5 days	6 days	7 days	8 days	9 days	10 days	11 days	12 days	13 days	14 days	15 days
Overnight	92.69	97.88	99.24	99.70	99.85	99.92	99.93	99.96	99.97	99.97	99.98	99.98	99.99	99.99	99.99
Two Day	14.82	89.44	96.35	98.67	99.51	99.76	99.86	99.91	99.94	99.95	99.96	99.97	99.98	99.98	99.98

Response to OCA/USPS-60(d)
FY 2002 First-Class Mail Single-Piece Letters Days to Delivery
Source: ODIS-RPW

PERCENT DELIVERED IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	92	98	99	99	100
TWO-DAY	24	86	96	98	99
THREE-DAY	7	40	81	92	96

PERCENT DELIVERED IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	99	100	100	100	100
THREE-DAY	98	99	99	100	100

PERCENT DELIVERED IN 11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	100	100	100	100	100
THREE-DAY	100	100	100	100	100

Response to OCA/USPS-60(d)
FY 2002 First-Class Mail Single-Piece Letters Days to Delivery
Source: ODIS-RPW

	KNOWN DELIVERY DAYS VOLUME					
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	21,292,448,873	19,579,345,823	20,807,903,529	21,014,831,270	21,133,101,180	21,186,418,899
TWO-DAY	9,519,811,938	2,312,129,202	8,191,627,311	9,107,718,381	9,333,099,870	9,422,709,525
THREE-DAY	9,160,238,862	605,830,545	3,638,634,879	7,406,427,528	8,469,783,775	8,820,665,812

	KNOWN DELIVERY DAYS VOLUME				
	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	21,218,166,432	21,237,055,254	21,252,595,904	21,262,402,731	21,267,971,431
TWO-DAY	9,459,528,358	9,480,039,112	9,494,368,298	9,502,542,704	9,506,850,443
THREE-DAY	8,979,701,008	9,044,985,399	9,091,180,957	9,117,771,084	9,132,167,346

	KNOWN DELIVERY DAYS VOLUME				
	11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	21,273,431,713	21,276,752,273	21,279,291,892	21,281,645,148	21,283,666,442
TWO-DAY	9,510,090,578	9,512,400,581	9,514,007,003	9,515,099,648	9,516,239,705
THREE-DAY	9,140,191,760	9,145,513,884	9,148,893,316	9,151,210,045	9,153,339,582

Response to OCA/USPS-60(d)
FY 2003 First-Class Mail Single-Piece Letters Days to Delivery
Source: ODIS-RPW

PERCENT DELIVERED IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	92	98	99	99	100
TWO-DAY	27	89	97	98	99
THREE-DAY	7	45	87	96	98

PERCENT DELIVERED IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	100	100	100	100	100
THREE-DAY	99	99	100	100	100

PERCENT DELIVERED IN 11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	100	100	100	100	100
THREE-DAY	100	100	100	100	100

Response to OCA/USPS-60(d)
FY 2003 First-Class Mail Single-Piece Letters Days to Delivery
Source: ODIS-RPW

	KNOWN DELIVERY	DAYS VOLUME				
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	20,777,888,311	19,168,809,186	20,353,041,852	20,536,690,589	20,646,524,523	20,693,525,119
TWO-DAY	9,395,068,645	2,514,988,427	8,386,968,922	9,089,408,384	9,249,506,405	9,321,321,258
THREE-DAY	9,022,662,714	620,098,980	4,056,290,294	7,861,390,845	8,628,816,384	8,853,372,606

	KNOWN DELIVERY	DAYS VOLUME				
		6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		20,719,567,475	20,735,336,918	20,747,625,215	20,755,162,662	20,759,899,711
TWO-DAY		9,349,638,892	9,365,435,292	9,375,554,100	9,381,271,624	9,384,939,329
THREE-DAY		8,937,566,128	8,970,645,975	8,991,674,020	9,003,034,864	9,007,677,018

	KNOWN DELIVERY	DAYS VOLUME				
		11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		20,764,090,461	20,766,608,315	20,768,471,014	20,770,220,619	20,771,529,866
TWO-DAY		9,387,279,834	9,389,482,576	9,390,649,302	9,391,481,814	9,392,121,324
THREE-DAY		9,011,375,997	9,013,976,828	9,015,963,298	9,016,996,697	9,017,943,069

Response to OCA/USPS-60(d)
FY 2004 First-Class Mail Single-Piece Letters Days to Delivery
Source: ODIS-RPW

PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	93	98	99	99	100
TWO-DAY	27	91	97	99	99
THREE-DAY	7	45	89	96	98

PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	100	100	100	100	100
THREE-DAY	99	99	100	100	100

PERCENT DELIVERED	IN 11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT	100	100	100	100	100
TWO-DAY	100	100	100	100	100
THREE-DAY	100	100	100	100	100

Response to OCA/USPS-60(d)
FY 2004 First-Class Mail Single-Piece Letters Days to Delivery
Source: ODIS-RPW

	KNOWN DELIVERY	DAYS VOLUME				
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
OVERNIGHT	20,854,762,005	19,381,158,665	20,432,707,904	20,628,649,052	20,721,699,617	20,766,477,745
TWO-DAY	9,311,414,106	2,525,183,052	8,457,008,591	9,041,609,240	9,177,682,609	9,240,364,533
THREE-DAY	8,959,575,969	629,189,243	4,050,403,796	7,975,649,357	8,586,252,322	8,795,083,849

	KNOWN DELIVERY	DAYS VOLUME				
		6 DAYS	7 DAYS	8 DAYS	9 DAYS	10 DAYS
OVERNIGHT		20,792,036,984	20,810,368,921	20,822,751,480	20,830,316,172	20,834,669,581
TWO-DAY		9,270,192,845	9,283,876,242	9,292,202,059	9,298,501,545	9,300,992,477
THREE-DAY		8,875,831,195	8,906,521,602	8,928,495,852	8,939,570,752	8,945,239,818

	KNOWN DELIVERY	DAYS VOLUME				
		11 DAYS	12 DAYS	13 DAYS	14 DAYS	15 DAYS
OVERNIGHT		20,839,073,953	20,841,466,559	20,843,590,816	20,844,843,908	20,847,257,649
TWO-DAY		9,303,643,963	9,305,111,040	9,306,281,239	9,307,010,659	9,307,738,940
THREE-DAY		8,948,703,021	8,951,171,906	8,952,827,829	8,953,830,169	8,954,979,576

Response to OCA/USPS-60(d)
FY 2001, FY 2002, FY 2003 First-Class Mail Days to Delivery
Source: EXFC

External First-Class Mail Measurement System

FY 2002	Percent Delivered Within														
Service Standard	1 day	2 days	3 days	4 days	5 days	6 days	7 days	8 days	9 days	10 days	11 days	12 days	13 days	14 days	15 days
Overnight	93.71	97.66	98.86	99.33	99.57	99.71	99.80	99.86	99.90	99.92	99.94	99.96	99.96	99.97	99.98
Two Day	16.59	85.32	95.25	97.92	98.96	99.41	99.62	99.77	99.84	99.88	99.90	99.93	99.94	99.95	99.97
Three Day	2.89	28.09	80.09	91.82	96.11	97.96	98.78	99.33	99.59	99.72	99.81	99.87	99.90	99.92	99.94

FY 2003	Percent Delivered Within														
Service Standard	1 day	2 days	3 days	4 days	5 days	6 days	7 days	8 days	9 days	10 days	11 days	12 days	13 days	14 days	15 days
Overnight	94.78	98.11	99.08	99.50	99.69	99.80	99.86	99.90	99.93	99.95	99.96	99.97	99.98	99.98	99.98
Two Day	17.99	90.34	96.72	98.55	99.29	99.61	99.75	99.85	99.90	99.93	99.94	99.96	99.97	99.97	99.98
Three Day	3.36	33.39	88.02	95.78	98.22	99.12	99.49	99.71	99.81	99.86	99.90	99.93	99.94	99.95	99.96

FY 2004	Percent Delivered Within														
Service Standard	1 day	2 days	3 days	4 days	5 days	6 days	7 days	8 days	9 days	10 days	11 days	12 days	13 days	14 days	15 days
Overnight	95.27	98.32	99.19	99.55	99.72	99.82	99.88	99.92	99.94	99.96	99.97	99.97	99.98	99.98	99.99
Two Day	18.01	91.31	97.02	98.68	99.35	99.63	99.77	99.86	99.90	99.93	99.94	99.96	99.97	99.97	99.98
Three Day	3.46	32.50	88.84	95.99	98.32	99.15	99.50	99.72	99.82	99.87	99.90	99.93	99.94	99.95	99.96

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-61. Please refer to the response to DBP/USPS-48, regarding Registered Mail, where it states, in part, "The number of claims, the number of claims paid, and the dollar amount paid for claims do not exactly match the numbers provided in response to DFC/USPS-23 because the response to this interrogatory [DBP/USPS-48] is based on data relating to claims accepted in a fiscal year while the earlier response [to DFC/USPS-23] used data that tracked claims resolved in a fiscal year."

(a) Please confirm that for FY2004, the total number of "Claims Filed" for Registered Mail was 1012, as shown on Page 1 of the Attachment to DBP/USPS-48. If you do not confirm, please explain.

(b) Please confirm that for FY2004, the total number of "Claims Paid" (i.e., "resolved") for Registered Mail was 612, as shown on Page 1 of the Attachment to DFC/USPS-23. If you do not confirm, please explain.

(c) Please confirm that for FY2004, the total value of 'Claims Paid" for Registered Mail was $1,766,268, as shown on Page 1 of the Attachment to DFC/USPS-23. If you do not confirm, please explain.

(d) Please confirm that for FY2004, the total value of Registered Mail Claims Paid of $1,766,268 is reported in C/S 20 of the Cost Segments and Components Report, FY 2004. If you do not confirm, please explain and provide the correct amount and cost segment.

(e) Please refer to Page 1 of the Attachment to DBP/USPS-48. For the columns "Claims Paid" and "Value of Claims," please provide the number of claims paid (i.e., "resolved") for each value level that equals 612, and the value of claims paid for each value level that equals $1,766,268, respectively.

RESPONSE:

(a) Confirmed

(b) Confirmed

(c) Confirmed

(d) The amount shown in C/S 20 for FY 2004 is $1.878 million (see Exhibit USPS-9A, page A-25). The amount reported in C/S 20 is different from the value reported in the response to DFC/USPS-23 because of the distribution of unallocated indemnity costs from the general ledger, as well as the timing of the recording of the claims. For example, if a claim is adjudicated on September 25, 2004 and is paid on October 3, 2004, the claim would be reported in FY 2004 in the St. Louis Accounting Service

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

Center report, but would be reported in C/S 20 of the FY 2005 Cost Segments and Components Report.

(e) Those data are not available. Please see the response to DBP/USPS-76, filed May 31, 2005.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-62. Please refer to the response to DBP/USPS-48, and Pages 2 and 3 of the Attachment to DBP/USPS-48. Please provide "Registered Mail Volume and Claims Data by Value Category" for FY 2000 through FY 2001.

RESPONSE:

FY 2001 and 2000 Registered Mail Volume and Claims by Value Category

	2001			2000		
Value Up To	Volume	Claims Paid	Value of Claims	Volume	Claims Paid	Value of Claims
No Value	2,375,278	N/A	N/A	3,101,198	N/A	N/A
100	713,493	101	$7,895	721,403	129	$10,406
500	1,133,735	238	69,048	1,297,793	289	86,773
1,000	871,551	222	141,362	853,593	275	178,763
2,000	690,531	188	233,916	727,155	263	334,841
3,000	410,428	104	227,161	442,106	130	271,374
4,000	251,628	34	93,102	246,977	70	205,595
5,000	306,231	65	196,009	268,626	73	251,672
6,000	123,062	27	130,412	137,063	31	119,667
7,000	83,816	21	94,541	126,925	14	72,280
8,000	102,363	15	100,147	85,161	17	123,365
9,000	61,117	13	89,075	50,504	5	38,092
10,000	132,604	33	231,772	149,845	25	151,778
11,000	50,125	11	90,901	39,088	7	56,345
12,000	46,719	10	106,747	37,822	9	84,163
13,000	25,292	4	38,244	56,660	6	61,702
14,000	34,212	9	81,058	34,130	7	73,355
15,000	54,261	4	31,696	41,695	9	99,939
16,000	19,653	5	43,428	17,674	3	39,410
17,000	17,701	3	49,730	25,429	1	16,901
18,000	14,536	1	17,912	27,306	8	125,757
19,000	14,203	2	36,605	16,747	2	21,049
20,000	41,615	10	164,956	50,253	9	112,909
21,000	12,877	1	20,104	39,257	3	59,720
22,000	18,714	4	65,734	14,876	1	11,728
23,000	8,440	1	23,001	10,791	4	26,434
24,000	18,691	2	48,005	15,619	2	43,841
25,000	93,939	43	779,585	177,503	42	774,977
TOTAL	7,726,815	1,171	3,212,147	8,813,199	1,434	3,452,838

Source: Registered Mail volume from the FY 2000 and FY 2001 Billing Determinants.
Claims paid and value of claims data from Accounting
Service Center in St. Louis.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-63. Please refer to the response to DBP/USPS-25.

(a) For FY 2004, please confirm that the total Post Office to Address [sic] Express Mail volume is 54,383,250. If you do not confirm, please explain.

(b) For FY 2004, please confirm that the percent of delivery failures of 2,329,666 to the total Post Office to Address Express Mail volume of 54,383,250 is 4.28 percent (2,329,666 / 54,383,250). If you do not confirm, please explain.

RESPONSE:

(a) The Express Mail Billing Determinants (located in USPS-LR-K-77) list 54,383,250 as the total Post Office to Addressee volume for FY 2004.

(b) The calculation is confirmed. The percent noted in the response to DBP/USPS-25 was calculated using a Post Office to Addressee volume figure derived from the Product Tracking System (PTS).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-64. Please refer to the response to DBPUSPS-43, regarding Express Mail on-time delivery failures, which states, in part, "The Postal Service continues to work with the airlines to improve transportation."

(a) To what extent are the delivery failures for Next Day and Second Day Express Mail caused by the Postal Service's use of commercial airlines to transport Express Mail? Please explain.

(b) Please rank order and discuss the most important factors causing the 1,742,209 delivery failures for Next Day Express Mail, and the 587,457 delivery failures for Second Day Express Mail.

RESPONSE:

(a)-(b) The Postal Service does not maintain information regarding the cause of particular Express Mail delivery failures.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-65. Please refer to the response to DBP/USPS-43.

(a) For FY 2002 and FY 2003, please provide the total number of delivery failures for Post Office to Addressee Express Mail, and the number of delivery failures separately for Next Day and Second Day Post Office to Addressee Express Mail. Also, for FY 2002 and FY 2003, please provide the total volume of Postal Office to Addressee Express Mail.

(b) For FY 2002 and FY 2003, please provide the percent of delivery failures to the total volume of Post Office to Addressee Express Mail, and the percent of delivery failures to total delivery failures separately for Next Day and Second Day Post Office to Addressee Express Mail.

RESPONSE:

(a) In 2002, there was a change in the reporting system which resulted in a partial year of data being reported for FY 2002. From late August 2002 to September 30, 2002, there were 271,285 delivery failures for Post Office to Addressee Express Mail service. Next Day Service accounted for 210,809 of the delivery failures, and Second Day Service accounted for 60,576 of the delivery failures.

In FY 2003, there were 2,776,522 delivery failures for Post Office to Addressee Express Mail service. Next Day Service accounted for 2,009,154 of the delivery failures, and Second Day Service accounted for 767,368 of the delivery failures.

(b) In 2002, there was a change in the reporting system which resulted in a partial year of data being reported for FY 2002. From late August 2002 to September 30, 2002, the percent of total Post Office to Addressee delivery failures to total Post Office to Addressee Express Mail volume was 5.4%, with Next Day Service accounting for 4.2% and Second Day Service accounting for 1.2%.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

For FY 2003, the percent of total Post Office to Addressee delivery failures to total Post Office to Addressee Express Mail volume was 5.3%, with Next Day Service accounting for 3.8% and Second Day Service accounting for 1.5%.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-66. Please refer to the response to DBPUSPS-44(b).

(a) For FY 2004, please provide the total amount of the Postal Service's potential monetary exposure if all customers who experienced delivery failures requested refunds because of the failure to deliver Express Mail by the guaranteed delivery time.

(b) Please provide the total amount of Express Mail refunds for FY2002 and FY2003, and the total amount of Postal Service's potential monetary exposure if all customers who experienced delivery failures requested refunds because of the failure to deliver Express Mail by the guaranteed delivery time.

RESPONSE:

(a) Around $37.6 million.

(b) For FY 2003, around $ 46.8 million. For FY 2002, around $49.2 million.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-67. Please refer to the response to DFC/USPS-12. Please rank order and discuss the most important factors causing the Postal Service's failure to obtain Delivery Confirmation scans for 2 percent of Priority Mail pieces, 3 percent of Package Service parcels, and 6 percent of First-Class Mail Letters and Sealed Parcels subclass parcels during the period January through March of 2005.

RESPONSE:

The Postal Service's failure to obtain scans on Delivery Confirmation pieces in Priority Mail, Package Service (parcels), and First-Class Mail Letters and Sealed Parcels (parcels) during January – March 2005 results from failure to follow the scanning procedures at delivery. See Handbook PO-610, attachment 1 to the response to DFC/USPS-9.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-68. Please refer to the response to DFC/USPS-13. Please rank order and discuss the most important factors causing the Postal Service's failure to record a scan indicating final disposition for the 6 percent of Certified Mail pieces that received an acceptance scan at a retail terminal but did not receive a scan indicating final disposition, including delivery, during the period January through March of 2005.

RESPONSE:

The following factors, which are not in rank order because we have not conducted supporting analysis, contributed to the Postal Service's failure to record a final disposition scan on Certified Mail pieces during January – March 2005:

- Certified Mail Detectors' (CMDs') failure to extract Certified Mail from DPS mail.

- Taggant on the Certified Mail label is covered by the PVI label, thereby preventing the CMDs from extracting the Certified Mail from Delivery Point Sequencing mail.

- Letter carrier not riffling DPS letter mail to detect Certified Mail pieces.

- Scanning and firm sheet creation procedures not followed at delivery. See Handbook PO-610, attachment 1 to the response to DFC/USPS-9.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-69. Please refer to the response to DFC/USPS-16. Please rank order and discuss the most important factors causing the Postal Service's failure to obtain a signature for the 5 percent of mail for which electronic return receipt was purchased that also received a scan indicating a final disposition, such as delivery, but did not have a signature linked to the piece, during the period February through March, 2005.

RESPONSE:

Failure to obtain signatures at delivery are due to signature capture procedures not being followed. See Handbook PO-610, attachment 1 to the response to DFC/USPS-9.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-70. Please refer to the response to DFC/USPS-17. Please rank order and discuss the most important factors causing the Postal Service's failure to obtain a signature for 8 percent of Signature Confirmation pieces without signature waiver requested that also received a scan indicating a final disposition but did not have a signature linked to the piece during the period February through March, 2005.

RESPONSE:

Failure to obtain signatures at delivery are due to signature capture procedures not being followed. See Handbook PO-610, attachment 1 to the response to DFC/USPS-9.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-71. Please refer to the response to DFC/USPS-18. For Delivery Confirmation items for which an acceptance scan was recorded at a retail terminal, please rank order and discuss the most important factors causing the Postal Service's failure to obtain a Delivery Confirmation scan indicating a final disposition or delivery for 2 percent of Priority Mail pieces, 3 percent of Package Service parcels, and 3 percent of First-Class Mail Letters and Sealed Parcels subclass parcels during the period January through March of 2005.

RESPONSE:

Please see the response to OCA/USPS-67.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-72. Please refer to the response to DFC/USPS-19. For special services where acceptance is recorded at a retail terminal or by electronic manifest, please rank order and discuss the most important factors causing the Postal Service's failure to obtain a scan for 6 percent of Certified Mail, 7 percent of Registered Mail, 4 percent of Signature Confirmation on Priority Mail, 5 percent of Signature Confirmation on Package Services parcels, and 7 percent of Signature Confirmation on First-Class Mail Letters and Sealed Parcels subclass parcels during the period January through March, 2005.

RESPONSE:

Please see the responses to OCA/USPS-67 and, for Certified Mail and

Registered Mail, OCA/USPS-68.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-73. Please refer to the tables below.

(a) For Fiscal Years 2002, 2003, and 2004, please complete the following table to indicate the percent of Express Mail accepted for delivery by delivery day.

Percent of Express Mail Accepted for Delivery by Delivery Day						
	Next Day			Second Day		
				Second Delivery Day		
	Noon	3:00 PM		(3rd Day)	(4th Day)	(5th Day)
PO to Addressee						

Please provide a source for all figures used in the table. (For reference, please see Docket No. R2001-1, OCA/USPS-74.)

(b) For Fiscal Years 2002, 2003, and 2004, please complete the following table to indicate the percent of Express Mail delivered by delivery day.

Percent of Express Mail for Delivered by Delivery Day						
	Next Day			Second Day		
				Second Delivery Day		
	Noon	3:00 PM		(3rd Day)	(4th Day)	(5th Day)
PO to Addressee						

Please provide a source for all figures used in the table.

RESPONSE:

(a) Data are not available in the format requested. The following data is derived from the Product Tracking System (PTS). Please note that the scheduled delivery date under PTS may not necessarily correspond to the guarantee that the customer receives and upon which refund decisions are based:

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

Percent of Express Mail Accepted for Delivery by Day						
	Next Day			Second Day		
	Noon	3:00 PM		(Day 2)	(Day 3)	(Day 4)
FY 2002	43%	23%		22%	10%	2%
FY 2003	45%	24%		20%	8%	3%
FY 2004	48%	22%		18%	5%	5%

(b) Data are not available in the format requested. The following data is derived from the Product Tracking System (PTS).

Percent of Express Mail Delivered by Day						
	Next Day			Second Day		
	Noon	3:00 PM		(Day 2)	(Day 3)	(Day 4)
FY 2002	62%	14%		20%	3%	1%
FY 2003	66%	13%		18%	3%	1%
FY 2004	67%	12%		18%	3%	1%

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-78. Please confirm that the Delivery Operations Information System (DOIS) was deployed to offices with city carrier delivery routes over the period June 2001 through September 2002. If this is not correct, then please provide the correct dates.

Response

The initial Headquarters deployment of DOIS began in June 2001 and continued through September 2002. After that time, the Areas and Districts have continued to add additional DOIS sites.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-79. Please confirm that since September 2002, every office with 8 or more city carrier routes is part of the Delivery Operations Information System (DOIS). If this is not correct, then please provide the correct information.

a. Is it correct that 163,000 city carrier routes are part of DOIS? If this is not correct, then please give the correct figure.

b. Is it correct that 5000 city carrier routes are not part of DOIS? If this is not correct, then please give the correct figure.

Response

Headquarters initially implemented DOIS in every office with eight or more City carrier routes and expects that the Areas have continued to follow that guidance.

A. The Postal Service estimates that the number of City routes in offices with DOIS systems is more than 158,000.

B. The balance of City routes, those not in DOIS, is about 6,000.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-80. Please confirm that it is Postal Service policy for city carrier delivery unit supervisors who are in the Delivery Operations Information System (DOIS) to use the system.

Response

Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-81. Please confirm that the average number of city carrier routes per delivery unit supervisor is approximately 25.

a. If this is not correct, then please provide the correct figure.

b. How many city carrier delivery unit supervisors are there?

Response

A. The number of facilities with City delivery is 9,073.

The number of City routes is 164,596.

The average is just a bit more than 18 routes per facility with City delivery.

B. The Postal Service has about 12,000 Delivery Service supervisors.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-82. Please confirm that Delivery Operations Information System (DOIS) data are maintained on a current basis for a period of 13 months. If this is not correct, then please provide the correct information.

Response

Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-83. Please confirm that all Delivery Operations Information System (DOIS) data since implementation are archived in Eagan, MN. If this is not correct, then please provide the correct information.

Response

Confirmed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-84. Please confirm that the Time and Attendance Control System (TACS) supplies hours actually worked by city carriers, on a daily basis, as an input to the Delivery Operations Information System (DOIS).

a. If this is not correct, then please supply the correct information.

b. Please confirm that, under TACS, a city carrier must clock in/out at the delivery office:

   i. clock in, at the beginning of the work day
   ii. clock out to the street, after the in-office tasks are completed
   iii. clock in from the street, after the street tasks (primarily delivery) have been completed
   iv. clock out of the office at the end of the work day
   v. clock in, at the beginning of auxiliary time, when another carrier needs assistance
   vi. clock out, at the end of auxiliary time, when the assistance period is completed
   vii. that auxiliary clocking in and out is done on a time clock for in-office assistance
   viii. that auxiliary clocking in and out is done by means of a written form when the assistance is given as part of the delivery function, on the street (what form is used for this purpose? Please supply a copy of the form)
   ix. If any of the above cannot be confirmed, then please explain.

Response

A. Confirmed.

B. These are the required clock rings for recording time and attributing to the correct assignment. However, carriers may or may not complete clock rings for auxiliary time at the precise start and completion of provided auxiliary time. Carriers are required to complete those clock rings before their last clock ring of the day. The form supervisors use to track auxiliary assistance is the USPS Form 3996, Carrier – Auxiliary Control form (attached).

United States Postal Service
Carrier - Auxiliary Control

A. Delivery Unit	B. Telephone	C. Date
D. Carrier's Name and Route No.	E. Lunch Place and Time	

F. Ind. ...ntire or portion of the case shelves covering mail as street auxiliary assistance

1	2	3	4	5	6

G. Keys Required? Yes ☐ No ☐

H. Carfare Required? Yes ☐ No ☐

I. Accountable Mail? Yes ☐ No ☐

J. Reason For Use of Auxiliary

K. Estimated Work		L. Management Action. Check and initial all appropriate actions.					
Hours	Minutes	**Auxiliary Assistance**	Hours	Minutes	**Overtime**	Hours	Minutes
		Approved ☐			Approved ☐		
		Disapproved ☐			Disapproved ☐		

M. Transportation *(If drive-out, show parking location(s) on reverse)*

Transportation Mode to and from route: Postal owned: ☐ Drive-out: ☐ Contract: ☐ Public: ☐

N. Starts Delivery at:	* Collect mail from all collection boxes on your part of the route, unless instructed otherwise.
Delive...	Collection boxes locations:
	1
	2
	3
	4
	5
	6

O. Find Relays At:

1	4
2	5
3	6

P. Assistance Completed By *(Carrier Name and regular route number if assigned)*:

Office Time		Street Time				Total Auxiliary Time
Begin ...	Time Used	Begin Travel To	Begin Delivery	Begin Travel From	Travel To	
					Delivery	
End Time		End Travel To	End Delivery	End Travel From	Travel From	
					Total Street	

PS Form **3996**, November 1997

Instructions

The regular carrier shall prepare the form as follows (except as indicated)

A. Enter the name of the delivery unit.

B. Enter telephone number for the unit.

C. Enter the date requesting assistance.

D. Enter the name of the carrier requesting assistance or overtime and the route number.

E. Enter the lunch place and time, if applicable.

F. Place an "X" in space below the number indicating the case shelf containing the mail for which assistance is being requested. The bottom shelf of the letter separations is designated under 1. When assistance is required for less than a full shelf of mail, enter the portion of shelf in fractions. The portion should be identified as follows: L 1/2; R 1/4; (L) indicates "Left"; (R) Right; and (M) is for Middle of the shelf.

G. Indicate if Keys are required for delivery of this portion of the route.

H. Indicate if Carfare is required for delivery of this portion of the route.

I. Indicate if there are any Accountable mail pieces for delivery of this portion of the route.

J. Show the reason assistance is being requested. (Omit during Christmas period)

K. The carrier must enter the estimated hours and minutes of the amount of assistance being requested.

L. MANAGEMENT ACTION - This section is completed by the manager reviewing the form.
The manager reviews the request and makes a determination as to the appropriate actions. The manager shall check the appropriate actions and initial each section.

M. Show the transportation information as indicated.

N. Indicate the delivery starting point and the blocks of each street to be delivered.

O. List the points where relays will be found.
The form is handed to the carrier assigned to provide the assistance. who will complete the bottom time entries.

P. This section is completed by the carrier providing the assistance and the delivery manager.
It is broken into four sections; the replacement carriers name, office work, street work and the total workhours used.

<u>The carrier will complete the following items:</u>

The assisting carrier will enter their name and regular route number if applicable;

Enter the begin and end time for any office work performed as assistance on this route;

Enter the begin travel time to the delivery territory and the end travel time to the delivery territory on this route;

Enter the begin delivery time to the delivery territory and the end delivery time on this route;

Enter the begin travel time from the delivery territory and the end travel time from the delivery territory on this route, and then turn in the completed form to the delivery manager.

<u>The Delivery Manager will complete the following item:</u>

Office time used;

Travel to time;

Delivery time;

Travel from time;

Total street time, and

Total auxiliary time used.

Park locations:

1. _____ 4. _____

2. _____ 5. _____

3. _____ 6. _____

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-85. Please confirm that the Piece Count Recording System (PCRS) supplies daily end-of-run mail counts for the last sorting operation performed on automatable letter-shaped mail that was run in the last destination Processing and Distribution Center (P & DC) or comparable facility prior to entry at the delivery office.

a. If this is not correct, then please provide the correct information.
b. Please list the types of letter-sorting machines and sorting operations that are the source(s) of the end-of-run reports furnished under the Delivery Operations Information System (DOIS).
c. Does DOIS refer to such end-of-run reports as DPS volumes? If not, then please explain.
d. Please provide a sample copy of such an end-of-run report.

Response

A. The Piece Count Recording System is a procedure. It provides no data. The End of Run reports from processing equipment to provide the volume data.

B. DOIS gets End of Run information from the barcode sorters (DBCSs and CSBCSs) that finalize letters for delivery operations.

C. If the End of Run data is from a DPS operation, DOIS counts that volume as DPS. If the End of Run Data is from a carrier-route sorting operation, DOIS counts the mail as Automated Caseable letters.

D. Copies of DBCS and CSBCS End of Run reports are attached.

6/2/2005 7:17:08AM
WebEOR 1.0.22

END OF RUN DETAIL LISTING

MACHINE:	DBCS # 1 06.05	**SITEID:**	[redacted]
JC MODE:	ICS	**DESCR:**	[redacted]
SERNO:	3146	**FIN NO:**	[redacted] **JAMS:** 8
SORTPLAN:	LV64138U-2 6/1/2005	**SRF:**	0 **STOPS:** 14
ZONE:	[redacted]		
OPN NO:	919000 **DOD:** DPS	**CUTOFF:**	7

START:	6/2/2005 04:29:00	**RUN:**	01:02:25	**MAR:**	99.86%	**ACC / OPN HR:**	27,560
END:	6/2/2005 05:40:18	**DOWN:**	00:04:27	**GAR:**	99.51%	**ACC / RUN HR:**	31,483
TOUR:	1	**IDLE:**	00:04:26	**DIG5:**	0	**THRUPUT / OPN HR:**	27,697
RUN NO:	6	**MAINT:**	00:00:00	**DIG9:**	68	**THRUPUT / RUN HR:**	31,639
PCS FED:	32,913	**JAM:**	00:00:00	**DIG11:**	24,773	**PLANET CODES:**	1,218

NON READS:	45	**A:**	0	**GAP:**	0
NO CODES:	21	**AB:**	0	**SKEW:**	0
OUT OF SORT:	*0*	**C:**	*68*	***OVER:***	4
OUT OF SEQ:	92	**C+:**	24,761	**UNDER:**	0
LAST STACKER:	4	**AB+:**	12		
STACKER FULL:	0				

1:	66	2:	2	4:	111	5:	376	6:	150	7:	93	8:	111
9:	75	10:	40	11:	44	12:	38	13:	220	14:	248	15:	114
16:	429	17:	206	18:	96	19:	399	20:	250	21:	136	22:	618
23:	589	24:	132	25:	351	26:	361	27:	199	28:	613	29:	497
30:	192	31:	737	32:	604	33:	556	34:	394	35:	351	36:	291
	208	38:	238	39:	343	40:	522	41:	175	42:	517	43:	555
	47	45:	400	46:	430	47:	139	48:	31	49:	478	50:	602
51:	372	52:	282	53:	356	54:	106	55:	429	56:	224	57:	184
58:	497	59:	542	60:	160	61:	444	62:	513	63:	252	64:	331
65:	426	66:	265	67:	795	68:	662	69:	81	70:	330	71:	444
72:	180	73:	350	74:	172	75:	154	76:	119	77:	120	78:	1
79:	495	80:	433	81:	96	82:	544	83:	524	84:	82	85:	541
86:	529	87:	129	88:	240	89:	532	90:	531	91:	473	92:	93
93:	365	94:	186	95:	524	96:	312	97:	338	98:	199	99:	408
100:	61	101:	759	102:	824	103:	21	104:	378	105:	35	190:	96

BIN TOTAL: **32,913**

[redacted]	CARRIER	C0A	NDD	TMP	WIN	NON	TCR	DPS
[redacted]	B001	0	0	0	0	0	111	111
[redacted]	B002	0	0	0	0	0	376	376
[redacted]	B003	0	0	0	0	0	150	150
[redacted]	B004	0	0	0	0	0	93	93
[redacted]	B005	0	0	0	0	0	111	111
[redacted]	B006	0	0	0	0	0	75	75
[redacted]	B007	0	0	0	0	0	40	40
[redacted]	B050	0	0	0	0	0	44	44
[redacted]	C000	0	0	0	0	0	38	38
[redacted]	C001	0	0	0	153	26	763	737
[redacted]	C002	10	0	3	0	3	747	744
[redacted]	C003	2	0	4	0	0	795	795
[redacted]	C004	20	0	0	57	35	1,451	1,416
[redacted]	C005	14	0	37	0	0	970	970
[redacted]	C006	11	0	41	0	20	1,374	1,354
[redacted]	C007	78	0	18	0	0	1,437	1,437
[redacted]	C008	115	0	40	0	6	1,462	1,456
[redacted]	C009	8	0	17	2	0	766	766
[redacted]	C010	13	0	18	63	21	1,155	1,134
[redacted]	C011	22	0	41	0	0	1,182	1,182
[redacted]	C012	34	0	11	0	0	1,045	1,045
[redacted]	C013	12	0	19	0	8	1,491	1,483
[redacted]	C014	19	0	10	0	12	785	773
[redacted]	C015	39	0	2	126	63	1,067	1,004
[redacted]	C016	26	0	6	0	0	1,231	1,231
[redacted]	C018	30	0	20	0	0	1,259	1,259
[redacted]	C019	19	0	9	0	0	1,053	1,053
[redacted]	C020	7	0	33	0	5	1,590	1,585
[redacted]	C022	44	0	35	0	0	1,033	1,033
[redacted]	C023	37	0	12	0	36	1,001	965
[redacted]	C024	27	0	33	0	0	1,093	1,093
[redacted]	C025	19	0	30	1	8	1,208	1,200
[redacted]	C026	3	0	5	6	8	1,237	1,229
[redacted]	R017	0	0	0	0	2	245	243
[redacted]	R046	0	0	0	0	0	1,641	1,641
[redacted]	R065	0	0	0	0	0	552	552
[redacted]	Z001	0	0	0	0	0	0	
[redacted]	R017	0	0	0	0	0	1,639	1,639

R046	0	0	0	0	0	378	378

6/2/2005 7:01:39AM
WebEOR 1.0.22

END OF RUN DETAIL LISTING

ACHINE:	CSBCS # 42 4.40A	**SITEID:**	[redacted]
OC MODE:		**DESCR:**	[redacted]
SERNO:	L2037	**FIN NO:**	[redacted] **JAMS:** 0
SORTPLAN:	M1747A83	**SRF:**	4 **STOPS:** 4
ZONE:	[redacted]		
OPN NO:	905000 **DOD:** DPS	**CUTOFF:**	12

START:	6/1/2005 03:57:20	**RUN:**	00:11:38	**MAR:**	99.69%	**ACC / OPN HR:**	31,605
END:	6/1/2005 04:11:27	**DOWN:**	00:00:08	**GAR:**	99.11%	**ACC / RUN HR:**	38,352
TOUR:	1	**IDLE:**	00:02:21	**DIG5:**	0	**THRUPUT / OPN HR:**	31,890
RUN NO:	1	**MAINT:**	00:00:00	**DIG9:**	45	**THRUPUT / RUN HR:**	38,697
PCS FED:	7,503	**JAM:**	00:00:00	**DIG11:**	7,348	**PLANET CODES:**	0

NON READS:	23	**A:**	0	**GAP:**	1
NO CODES:	0	**AB:**	0	**SKEW:**	0
OUT OF SORT:	20	**C:**	45	**OVER:**	2
OUT OF SEQ:	4	**C+:**	7,345	**UNDER:**	0
LAST STACKER:	0	**AB+:**	3		
STACKER FULL:	0				

1:	67	2:	395	3:	512	4:	561	5:	562	6:	512	7:	582
8:	529	9:	614	10:	492	11:	527	12:	410	13:	605	14:	452
15:	251	16:	306	17:	126								

BIN TOTAL: 7,503

	CARRIER	9-Dig Str	Multi Pt	Non-Dps	Firm	2nd Pass
[redacted]	B001	0	0	0	0	156
[redacted]	B002	0	0	0	0	22
[redacted]	B003	0	0	0	0	57
[redacted]	B004	0	0	0	0	48
[redacted]	B005	0	0	0	0	18
[redacted]	B006	0	0	0	0	56
[redacted]	B007	0	0	0	0	22
[redacted]	C001	0	0	0	0	609
[redacted]	C002	0	0	0	0	562
[redacted]	C003	0	0	0	0	398
[redacted]	C004	0	0	0	0	411

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-86. Please confirm that the Piece Count Recording System (PCRS) supplies daily end-of-run mail counts for the last sorting operation performed on automatable flat-shaped mail that was run in the last destination Processing and Distribution Center (P & DC) or comparable facility prior to entry at the delivery office.

a. If this is not confirmed, then please provide the correct information.
b. Please list the types of flat-sorting machines and sorting operations that are the source(s) of the end-of-run reports furnished under the Delivery Operations Information System (DOIS).
c. Please supply a sample copy of such an end-of-run report.

Response

A. The Piece Count Recording System is a procedure. It provides no data. The End of Run reports from processing equipment to provide the volume data.

B. DOIS gets End of Run information from the flat sorters (UFSM1000s and AFSM100s) that finalize flats for delivery operations.

C. Copies of UFSM100 and AFSM100 End of Run reports are attached.

MACHINE: UFSM1000 # 1 10.1
LOC MODE:
SERNO: 643-778
SORTPLAN: CR64114 5/1/2003
ZONE: [redacted]
OPN NO: 816000 DOD: NONE

SITEID: [redacted]
DESCR: [redacted]
FIN NO: [redacted]
SRF: 0
CUTOFF: 7

JAMS: 13
STOPS: 3

START:	5/13/2004 03:36:57	RUN:	00:43:48	MAR:	97.37%
END:	5/13/2004 05:40:10	DOWN:	00:07:14	GAR:	97.37%
TOUR:	1	IDLE:	01:12:11	DIG5:	316
RUN NO:	5	MAINT:	00:00:00	DIG9:	1,836
PCS FED:	5,769	JAM:	00:06:49	DIG11:	3,080

ACC / OPN HR:	2,487	NON READS:	509	A:	316
ACC / RUN HR:	6,997				
THRUPUT / OPN HR:	2,809	NO CODES:	0	C:	1,836
THRUPUT / RUN HR:	7,903				
PLANET CODES:	0	OUTOFSORT:	0	C+:	3,080

MECH REJECTS:	152	2:	161	3:	98	4:	85	5:	15	6:	72	7:	61	8:	59
KEY REJECTS:	0	9:	69	10:	64	11:	86	12:	71	13:	56	14:	69	15:	61
LIGHT BARRIER MISSING PCS:	59	16:	95	17:	121	18:	68	19:	79	20:	108	21:	93	22:	59
GATE FAILURE PURGES:	0	23:	62	24:	58	25:	71	26:	77	27:	121	28:	185	29:	64
		30:	71	31:	41	32:	81	33:	78	34:	79	35:	81	36:	62
		37:	70	38:	62	39:	44	40:	69	41:	95	42:	57	43:	138
		44:	160	45:	88	46:	109	47:	81	48:	64	49:	172	50:	51
			72	52:	14	53:	73	55:	56	56:	89	57:	13	58:	12
			7	60:	28	61:	1	62:	6	63:	7	69:	2	70:	22
		71:	35	72:	11	74:	1	76:	8	78:	77	79:	4	83:	3
		84:	5	85:	6	86:	2	87:	9	88:	4	89:	43	96:	128
		97:	35	98:	394	99:	509								

BIN TOTAL: 5,617

[redacted]	CARRIER	9-Dig Str	Multi Pt	Non-Dps	Firm	2nd Pass	Cased
[redacted]	B001	0	0	0	0	0	4
[redacted]	B002	0	0	0	0	0	9
[redacted]	B003	0	0	0	0	0	2
[redacted]	B004	0	0	0	0	0	6
[redacted]	B005	0	0	0	0	0	5
[redacted]	B006	0	0	0	0	0	3
[redacted]	B010	0	0	0	0	0	4
[redacted]	B050	0	0	0	11	0	77
[redacted]	C001	0	0	0	0	0	161
[redacted]	C002	0	0	0	0	0	98
[redacted]	C003	0	0	0	0	0	85
[redacted]	C004	0	0	0	0	0	15
[redacted]	C005	0	0	0	0	0	72
[redacted]	C006	0	0	0	0	0	61
[redacted]	C007	0	0	0	0	0	59
[redacted]	C009	0	0	0	0	0	69
[redacted]	C010	0	0	0	0	0	64
[redacted]	C011	0	0	0	0	0	86
[redacted]	C013	0	0	0	0	0	71
[redacted]	C015	0	0	0	0	0	56
[redacted]	C016	0	0	0	0	0	69
[redacted]	C017	0	0	0	0	0	61
[redacted]	C018	0	0	0	0	0	95
[redacted]	C019	0	0	0	0	0	121
[redacted]	C020	0	0	0	0	0	68
[redacted]	C021	0	0	0	0	0	79
[redacted]	C022	0	0	0	0	0	108
[redacted]	C023	0	0	0	0	0	93
[redacted]	C024	0	0	0	0	0	59
[redacted]	C025	0	0	0	0	0	62
[redacted]	C026	0	0	0	13	0	58
[redacted]	C027	0	0	0	0	0	71
[redacted]	C028	0	0	0	0	0	77
[redacted]	C029	0	0	0	0	0	121
[redacted]	C030	0	0	0	35	0	185
[redacted]	C031	0	0	0	0	0	64
[redacted]	C032	0	0	0	0	0	71
[redacted]	C033	0	0	0	0	0	41

[redacted]	C034	0	0	0	0	0	81
[redacted]	C035	0	0	0	0	0	78
[redacted]	C036	0	0	0	0	0	79
[redacted]	C037	0	0	0	0	0	81
[redacted]	C038	0	0	0	0	0	62
[redacted]	C039	0	0	0	7	0	70
[redacted]	C040	0	0	0	0	0	62
[redacted]	C041	0	0	0	6	0	45
[redacted]	C042	0	0	0	0	0	69
[redacted]	C043	0	0	0	0	0	95
[redacted]	C044	0	0	0	0	0	57
[redacted]	C041	0	0	0	0	0	138
[redacted]	C045	0	0	0	0	0	160
[redacted]	C046	0	0	0	0	0	88
[redacted]	C047	0	0	0	0	0	109
[redacted]	R060	0	0	0	0	0	81
[redacted]	R061	0	0	0	0	0	64
[redacted]	R069	0	0	0	0	0	172
[redacted]	R060	0	0	0	0	0	51
[redacted]	R061	0	0	0	0	0	72
[redacted]	R066	0	0	0	0	0	14
[redacted]	C046	0	0	0	0	0	73
[redacted]	R066	0	0	0	0	0	56

MACHINE:	AFSM100 # 11 9.2.1	SITEID:	[redacted]
AOC MODE:		DESCR:	[redacted]
SERNO:	2221	FIN NO:	[redacted]
SORTPLAN:	CR64015	SRF:	0
ZONE:	[redacted]		
OPN NO:	336000	DOD: NONE	
CUTOFF:	7		

START:	6/1/2005 00:06:02	RUN:	00:33:28	MAR:	99.07%	ACC / OPN HR:	14,240
END:	6/1/2005 01:15:55	DOWN:	00:04:18	GAR:	96.06%	ACC / RUN HR:	15,926
TOUR:	1	IDLE:	00:00:50	DIG5:	154	THRUPUT / OPN HR:	14,374
RUN NO:	1	MAINT:	00:00:00	DIG9:	1,645	THRUPUT / RUN HR:	16,578
PCS FED:	9,247	JAM:	00:10:22	DIG11:	7,027	PLANET CODES:	57

NON READS:	0	A:	0	MECH REJECTS:	86
				KEY REJECTS:	0
NO CODES:	0	C:	0	LIGHT BARRIER MISSING PCS:	0
OUTOFSORT:	12	C+:	0	GATE FAILURE PURGES:	0

1:	12	2:	178	3:	5	5:	7	6:	14	7:	18	8:	33
9:	30	10:	40	11:	45	12:	9	13:	16	14:	18	15:	27
16:	20	17:	38	18:	37	19:	8	20:	22	21:	8	22:	10
23:	4	24:	56	26:	142	27:	136	28:	112	29:	124	30:	146
31:	184	32:	110	33:	149	34:	147	35:	239	36:	130	37:	145
38:	156	39:	201	40:	149	41:	122	42:	49	43:	74	45:	105
[illegible]	102	47:	126	48:	169	49:	175	50:	192	51:	190	52:	146
	205	54:	143	55:	163	56:	210	57:	41	58:	139	59:	147
	164	61:	190	62:	176	63:	192	64:	192	65:	193	66:	136
67:	187	68:	149	69:	95	70:	204	71:	261	72:	175	73:	188
74:	159	75:	209	76:	166	77:	185	78:	12	79:	46	80:	65
81:	36	82:	32	83:	20	84:	5	85:	29	87:	4	88:	3
89:	117	90:	249										

BIN TOTAL: 9,262

CARRIER	9-Dig Str	Multi Pt	Non-Dps	Firm	2nd Pass	Cased
B001	0	0	0	0	0	7
B002	0	0	0	0	0	14
B003	0	0	0	0	0	18
B004	0	0	0	0	0	33
B005	0	0	0	0	0	30
B006	0	0	0	0	0	40
B007	0	0	0	0	0	45
B008	0	0	0	0	0	9
B009	0	0	0	0	0	16
B010	0	0	0	0	0	18
B011	0	0	0	0	0	27
B012	0	0	0	0	0	20
B013	0	0	0	0	0	38
B014	0	0	0	0	0	37
B015	0	0	0	0	0	8
B016	0	0	0	0	0	22
B021	0	0	0	0	0	8
B022	0	0	0	0	0	10
B023	0	0	0	0	0	4
C002	0	0	0	0	0	142
C004	0	0	0	0	0	136
C008	0	0	0	0	0	112
C011	0	0	0	0	0	124
C013	0	0	0	0	0	146
C014	0	0	0	0	0	184
C020	0	0	0	0	0	110
C021	0	0	0	0	0	149
C022	0	0	0	0	0	147
C023	0	0	0	0	0	239
C026	0	0	0	0	0	130
C028	0	0	0	0	0	145
R001	0	0	0	0	0	156
R006	0	0	0	0	0	201
R008	0	0	0	0	0	149
R010	0	0	0	0	0	122
R013	0	0	0	0	0	49
C001	0	0	0	0	0	105
C003	0	0	0	0	0	102

[redacted]	C005	0	0	0	0	0	126
[redacted]	C006	0	0	0	0	0	169
[redacted]	C007	0	0	0	0	0	175
[redacted]	C009	0	0	0	0	0	192
[redacted]	C010	0	0	0	0	0	190
[redacted]	C012	0	0	0	0	0	146
[redacted]	C015	0	0	0	0	0	205
[redacted]	C016	0	0	0	0	0	143
[redacted]	C018	0	0	0	0	0	163
[redacted]	C019	0	0	0	0	0	210
[redacted]	C020	0	0	0	0	0	41
[redacted]	C024	0	0	0	0	0	139
[redacted]	C025	0	0	0	0	0	147
[redacted]	C027	0	0	0	0	0	164
[redacted]	R002	0	0	0	0	0	190
[redacted]	R003	0	0	0	0	0	176
[redacted]	R004	0	0	0	0	0	192
[redacted]	R005	0	0	0	0	0	192
[redacted]	R007	0	0	0	0	0	193
[redacted]	R009	0	0	0	0	0	136
[redacted]	R011	0	0	0	0	0	187
[redacted]	R012	0	0	0	0	0	149
[redacted]	B001	0	0	0	0	0	12
[redacted]	B002	0	0	0	0	0	46
[redacted]	B003	0	0	0	0	0	65
[redacted]	B004	0	0	0	0	0	36
[redacted]	B005	0	0	0	0	0	32
[redacted]	B006	0	0	0	0	0	20
[redacted]	B007	0	0	0	0	0	5
[redacted]	B008	0	0	0	0	0	29
[redacted]	B010	0	0	0	0	0	4
[redacted]	B011	0	0	0	0	0	3
[redacted]	R021	0	0	0	0	0	204
[redacted]	R022	0	0	0	0	0	261
[redacted]	R023	0	0	0	0	0	175
[redacted]	R024	0	0	0	0	0	188
[redacted]	R025	0	0	0	0	0	159
[redacted]	R026	0	0	0	0	0	209
[redacted]	R027	0	0	0	0	0	165

R028	0	0	0	0	0	185

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-87. Please confirm that Piece Count Recording System (PCRS) supplies daily end-of-run mail counts for the last sorting operation performed on automatable package-shaped mail that was run in the last destination Processing and Distribution Center (P & DC) or comparable facility prior to entry at the delivery office.

a. If this is not correct, then please provide the correct information.
b. Please list the types of package-sorting machines and sorting operations that are the source(s) of the end-of-run reports furnished under the Delivery Operations Information System (DOIS).
c. Please supply a sample copy of such an end-of-run report.

Response

A, B, and C. Delivery units do not normally receive carrier-routed parcels. Therefore, they do not receive End of Run reports from parcel sorting operations.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-88. Please confirm that any (1) letter-shaped mail or (2) flat-shaped mail counts that are not available from an end-of-run report from the upstream Processing and Distribution Center (P & DC) or comparable facility prior to entry at the delivery office will be made manually at the delivery office on a piece or foot-length basis.

a. If this is not correct, then please provide the correct information.
b. Also confirm that these counts are entered into the Delivery Operations Information System (DOIS). If this is not confirmed, then please provide the correct information.
c. What is the conversion factor for measurements made in feet (1) for letter-shaped mail, and (2) for flat-shaped mail, into number of pieces?
d. Are these counts always recorded on a Data Collection Device (DCD)? If not, then please explain.
e. Are the manually-counted letter-shaped pieces referred to (in DOIS) as caseable automated letters? If not, what are caseable automated letters?
f. What terminology is used in DOIS for non-automatable letters?
g. Are the manually counted flats referred to (in DOIS) as caseable automated flats? If not, what are caseable automated flats?
h. What terminology is used in DOIS for non-automatable flats?

Response

A. Supervisors follow the procedures in the Piece Count Recording System to provide manual counts of letter and flat mail volumes that are not available from End of Run reports.

B. In offices with DOIS systems, supervisors record volume counts in DOIS. In non-DOIS offices, supervisors record volume on a Volume Recording Worksheet (PS Form 3921).

C. The Piece Count Recording System Management Instruction (Library Reference USPS-LR-K-128) shows the following foot to pieces conversion factors for letters and flats in Exhibit 1 on page 9.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

	Total Pieces per Foot	
Type of Mail	Letters	Flats
Manual	227	115
Automated	215	115
Sequenced	227	115

D. Offices that are on DOIS and have a working Data Collection Device should use that Data Collection Device for recording manual volume counts. Offices that do not use the Data Collection Device to record volume must record volumes on a Volume Recording Worksheet (PS Form 3921).

E. DOIS records automation-sorted letters that require carrier casing as Caseable Automated Letters. These letters generally arrive at the delivery unit carrier-routed rather than DPSed. DOIS categorizes this mail as Caseable Automated because supervisors get counts of these letter volumes from the End of Run report from the machine that processed them.

F. DOIS identifies the caseable letters that supervisors must manually count as Cased Letters.

G. DOIS records automation-sorted flats as Caseable Automated Flats because supervisors get counts of these letter volumes from the End of Run report from the machine that processed them.

H. The caseable flats that supervisors must manually count DOIS identifies as Flats.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-89. Please confirm that any package-shaped mail counts that are not available from the upstream Processing and Distribution Center (P & DC) or comparable facility prior to entry at the delivery office will be made manually at the delivery office on a piece basis.

a. If this is not correct, then please provide the correct information.
b. Also confirm that these counts are entered into the Delivery Operations Information System (DOIS). If this is not confirmed, then please provide the correct information.
c. Are these counts always recorded on a Data Collection Device (DCD)? If not, then please explain.
d. Are there any other type of counts, e.g., by weight? If so, then please describe them and provide any conversion factors used.

Response

A. Supervisors manually count parcels at delivery units.

B. In offices with DOIS systems, supervisors record volume counts in DOIS. In non-DOIS offices, supervisors record volume on a Customer Services Volume Recording Worksheet (PS Form 3922).

C. Offices that are on DOIS and have a working Data Collection Device should use that Data Collection Device for recording manual volume counts. Offices that do not use the Data Collection Device to record volume must record volumes by route and enter those numbers manually into DOIS if in a DOIS office.

D. Delivery operations do not use weights to count mail.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-90. Please confirm that the Delivery Operations Information System (DOIS) contains the number of sequenced bundles that are carried on a city carrier route each day.

a. If this is not confirmed, then please provide the correct information.
b. If this is correct, are the sequenced bundle counts part of the Piece Count Recording System (PCRS)? If this is not correct, then please explain.
c. Are sequenced bundles classified in DOIS as either: (1) Sequenced letter sets or (2) Sequenced flat sets? If this is not correct, then please supply the correct information.
d. What is the source of the piece count for sequenced bundles?

Response

A and B. The Postal Service does not count the bundles City carriers take with them to the street each day.

C and D. As described in the Piece Count Reporting System Management Instruction at page 8 (Library Reference USPS-LR-K-128), delivery supervisors count as Sequenced Sets, mail from saturation mailings that carriers take directly to the street without casing. While supervisors record letter and flat volume figures separately at the DOIS entry screen, reports consolidate the data into single number for sequenced pieces.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-91. Please confirm that the Delivery Operations Information System (DOIS) includes the estimated mileage for each city carrier route included in DOIS.

a. If this is not confirmed, then please provide the correct information.

b. Is the DOIS mileage figure limited to miles driven? Does it also include miles walked on the route? Please explain.

c. Are the miles walked available from any other source? Does that source interface with DOIS? Please explain.

Response

A. DOIS maintains as Route Base Information the actual daily mileage recorded during the route inspection. Only routes with vehicles have base mileage.

B. The route base mileage is the difference between the ending odometer reading and the beginning odometer reading. The figure does not include miles walked on the route.

C. The Postal Service does not record or maintain data showing the miles walked on carrier routes.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-92. Please confirm that as part of the Managed Service Point (MSP) System, carriers scan barcodes by means of Mobile Data Collection Devices (MDCDs):

a. At the time they leave the office for the street delivery activities
b. At their first delivery point
c. At their last delivery point
d. When they first return to the office, following completion of their street tasks
e. Also confirm that this information is supplied to the Delivery Operations Information System (DOIS).
f. If any of the above are not correct, then please explain.

Response.

A, B, C, D, E, and F. These are all MSP scan points.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-93. Please confirm that any unusual circumstances that cause the carrier to spend more time than estimated on regular tasks are recorded as "SPLY Impacts."

a. Also confirm that the amount of time consumed by the unusual task is recorded.
b. If any of the above are not correct, then please explain.
c. Please confirm that "SPLY Impacts" information is part of the Delivery Operations Information System (DOIS). If this is not correct, then please explain.

Response

A, B, and C. The DOIS system includes as a feature the ability for supervisors to enter unusual operational circumstances as 'SPLY Impacts.' The use of this feature is discretionary. DOIS includes this feature as a means to facilitate recording events that significantly effect unit operations (an ice storm that delayed transportation or fire that caused a facility evacuation, for example) such that the unit supervisors and managers will want to factor the impact into budget spreads or route inspection data in the next year. SPLY Impacts is not intended to record day to day changes in route performance.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-94. Please provide a sample copy of a Delivery Operations Information System (DOIS) "Workload Status Report" and explain how it is used.

Response

The supervisor should pull the Workload Status Report after completing the mail count and designation of carrier assignments. The Workload Status Report shows:

• the carriers assigned to each route and the amount of in-office or street time they are assigned

* the projected office time and a comparison to the route's schedule for in-office time

* each carrier's expected in-office productivity on the route to which they are assigned to perform in-office work

* the AM volume on each route

* the time that each route should be ready to leave the office

• the amount of time each route should take to deliver

* the time carriers should return from delivering their assignments

The Workload Status Report shows the supervisor's 'gameplan' for the unit for the day. A sample Workload Status report is attached.

94

Workload Sta[illegible]s Report

RESTRICTI[illegible]ORMATION

Service Dat[illegible] 06/09/2005

				AM Available							AM Curtailed		Office Workload & Projected Leave Time					Street Workload & Projected Return Time				
Route	Carrier	Type	OTDL	Proj Route OT/UT	% Std	Letters	Flats	PP	DPS	Seq Pos	Letters	Flats	Proj Office Hours	Aux Prov(+) Rcvd(-)	Misc Office Time	Proj Leave Time	Leave Time Var	Base Street Hours	Aux Prov(+) Rcvd(-)	Misc Street Time	Proj Return Time	Return Time Var
18001	[redacted]	PTF		-0:05	100	139	211	4	689				1:19	0:00	0:00	8:09 AM	-2:08	4:33	1:27	0:00	2:39 PM	-0:41
18002		REG	12	-2:05	97	345	193	7	893				1:29	0:00	0:00	8:19 AM	-3:03	3:29	0:57	0:00	1:15 PM	-2:05
18003		REG	12	0:00	100	323	206	8	1009				1:31	0:00				3:58	0:00	0:00		
		CAS												0:00					1:27			
		REG												0:00					0:56			
		PTF												0:00					0:59			
		T-6												0:00					0:35			
18004		REG		-0:54	72	171	298	10	833				1:18	0:00	0:00	8:07 AM	-2:00	4:42	1:06	0:00	2:26 PM	-0:54
18005		T-6		0:00	100	240	248	15	1239				1:31	0:00				4:12	0:00	0:00		
		REG												0:00					0:57			
		PTF												0:00					2:03			
		T-6												0:00					1:34			
18006		T-6		0:25	100	241	276	11	1112				1:35	0:00	0:00	8:25 AM	-2:19	4:06	1:34	0:00	2:34 PM	-0:45
18008		REG		-3:08	97	208	125	4	615				1:11	0:00	0:00	9:00 AM	-2:09	4:40	-0:59	0:00	1:11 PM	-3:08
		REG												0:00					0:59			
18010		REG	12	-0:41	69	280	313	10	1125				1:23	0:00	0:00	8:12 AM	-2:12	4:25	0:00	0:00	1:07 PM	-2:12
18011		PTF		-1:27	100	214	188	15	858				1:21	0:00	0:00	8:11 AM	-2:27	4:12	0:59	0:00	1:53 PM	-1:27
18012		CAS		-0:18	100	209	172	12	919				1:19	0:00	0:00	12:00 PM	2:07	4:56	1:02	0:00	6:29 PM	3:09
18013		T-6	12	-1:01	100	191	219	13	1019				1:24	0:00	0:00	8:13 AM	-2:14	4:22	1:13	0:00	2:18 PM	-1:01
18014		REG	12	-0:58	100	156	158	6	785				1:13	0:00	0:00	8:02 AM	-1:59	4:48	1:00	0:00	2:21 PM	-0:58
18015		T-6		-1:06	100	148	151	18	674				1:11	0:00	0:00	8:01 AM	-2:42	5:08	0:35	0:00	2:14 PM	-2:06
18016		REG		-0:36	78	147	265	10	716				1:17	0:00	0:00	9:06 AM	-1:35	5:09	0:59	0:00	3:44 PM	-0:36
18017		REG	10	0:09	87	160	211	6	840				1:15	0:00	0:00	8:05 AM	-2:13	4:32	0:56	0:02	2:05 PM	-1:15
18018		REG	10	0:00	100	159	233	7	834				1:24	0:00				4:27	0:00	0:00		
		REG												0:00					1:08			
		REG												0:00					1:06			
		T-6												0:00					1:13			
		REG												0:00					1:00			
18019		REG	12	-1:08	93	259	196	12	708				1:22	0:00	0:00	9:12 AM	-2:16	4:22	0:28	0:00	2:32 PM	-1:48
18020		REG	10	-2:37	100	270	160	12	734				1:18	0:00	0:00	8:09 AM	-2:37	4:04	0:00	0:00	12:43 PM	-2:37
Unit Totals				-15:30		3860	3823	180	15602	0	0	0	24:22		0:00		-29:47	80:05		0:02		-18:24

GENERATED BY: LEWIS, JEFF
Customs House 20018, 2001801

Unit Summary

		Authorized Hours		Worklo urs		Overtime / Leave Hours	
Total Case	7,683	Projected Hours	104:30	Total Office	24:23	Overtime	12:15
Total Base	37,234	Base Hours	144:43	Total Street	80:07	Annual Leave	16:00
		Budget Hours	127:00	Total Route	104:30	Sick Leave	16:00

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-95. Please provide a sample copy of a Delivery Operations Information System (DOIS) "Route Base Information Report."

Response

Please see the attached.

95

Route Base Information Report

RESTRICTE RMATION

Delivery Un. [redacted]

Regular Routes

Route	Type	Carrier	Volume						Base Times					Scheduled Times								
			AM Ltr	AM Flat	PM Ltr	PM Flat	Base PP	OPS %	Base PDs	Base Ofc Time	Rtr Time	Base Str Time	Tot Time	% to Std	FOT	BT	LV	RT	ET	OEI	SEI	Vehicle Nbr	Base Miles
18001	REG	[redacted]	1313	535	0	0	11	52	414	03:33	00:00	04:33	08:06	100	00:40	07:00	10:17	15:20	15:30	116.88	90.88	8221928	3
18002	REG		1855	756	0	0	18	50	841	04:38	00:00	03:29	08:07	97	00:40	07:00	11:22	15:20	15:30	181.60	241.76	8224867	3
18003	REG		1585	646	0	0	26	58	402	04:08	00:00	03:58	08:06	100	00:40	07:00	10:52	15:20	15:30	97.12	101.41	2202940	3
18004	REG		1617	659	0	0	13	56	361	03:26	00:00	04:42	08:08	72	00:40	07:00	10:08	15:20	15:30	105.40	76.69	8208095	3
18005	REG		1742	710	0	0	22	56	673	03:50	00:00	04:12	08:02	79	00:40	07:00	10:38	15:20	15:30	175.56	160.24	7204646	2
18006	REG		1648	672	0	0	19	58	255	04:01	00:00	04:06	08:07	92	00:40	07:00	10:44	15:20	15:30	63.60	62.18	2208915	3
18008	REG		1275	520	0	0	11	49	503	03:22	00:00	04:40	08:02	97	00:40	08:00	11:10	16:20	16:30	149.35	107.88	8223927	3
18010	REG		1475	641	0	0	14	60	496	03:23	00:00	04:25	07:48	69	00:40	07:00	10:25	15:20	15:30	146.60	112.30	8221934	4
18011	REG		1705	695	0	0	12	53	317	03:54	00:00	04:12	08:06	84	00:40	07:00	10:38	15:20	15:30	81.31	75.34	8223928	4
18012	REG		1116	455	0	0	11	56	675	03:02	00:00	04:56	07:59	97	00:40	07:00	09:54	15:20	15:30	222.04	136.72	1266580	3
18013	REG		1713	698	0	0	14	57	451	03:44	00:00	04:22	08:05	77	00:40	07:00	10:28	15:20	15:30	121.02	103.43	8216795	3
18014	REG		1149	468	0	0	15	53	337	03:11	00:00	04:48	07:59	100	00:40	07:00	10:02	15:20	15:30	105.88	70.10	1260225	4
18015	REG		1105	450	0	0	15	47	380	02:53	00:00	05:08	08:01	91	00:40	08:00	10:43	16:20	16:30	131.79	74.11	8221940	3
18016	REG		1160	473	0	0	11	47	425	02:45	00:00	05:09	07:54	78	00:40	08:00	10:42	16:20	16:30	154.47	82.63	8223929	4
18017	REG		1458	594	0	0	5	53	388	03:30	00:00	04:32	08:02	87	00:40	07:00	10:18	15:20	15:30	111.07	85.51	8200003	3

Generated by: LEWIS, JEFF

Customs House 20018, 2001801

4815

			Volume							Base Times					Scheduled Times							
Route	Type	Carrier	AM Ltr	AM Flat	PM Ltr	PM Flat	Base PP	DPS %	Base PDs	Base Ofc Time	R Tin.	se Str Time	Tot Time	% to Std	FOT	BT	LV	RT	ET	OEI	SEI	Vehicle Nbr	Base Miles
18018	REG	[redacted]	1447	590	0	0	15	55	347	03:39	00:00	04:27	08:07	94	00:40	07:00	10:23	15:20	15:30	94.93	77.92	8221942	4
18019	REG		1518	619	0	0	12	52	285	03:47	00:00	04:22	08:09	93	00:40	08:00	11:28	16:20	16:30	75.46	65.22	8221945	3
18020	REG		1543	629	0	0	6	51	372	03:53	00:00	04:04	07:57	100	00:38	07:00	10:46	15:20	15:30	95.84	91.50	7206873	4
Total			26424	10810	0	0	250		7922	64:39	0:00	80:05	144:45		11:58								59
Avg			1468	601	0	0	14		440	3:36	0:00	4:27	8:03		0:40	7:13	10:37	15:33	15:43	122.59	98.91		3

Miscellaneous Routes

			Volume							Base Times					Scheduled Times							
Route	Type	Carrier	AM Ltr	AM Flat	PM Ltr	PM Flat	Base PP	DPS %	Base PDs	Base Ofc Time	Rtr Time	Base Str Time	Tot Time	% to Std	FOT	BT	LV	RT	ET	OEI	SEI	Vehicle Nbr	Base Miles
18021	T-6	[redacted]											00:00										
18023	T-6												00:00										
18024	T-6												00:00										
18031	T-6												00:00										
18868	OMB												04:00			07:30							
Total													4:00										
Avg													0:48			1:30							

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-96. Please provide a sample copy of a Delivery Operations Information System (DOIS) "Route Information Card."

Response

Please see the attached.

96

Route Information Card

RESTRICTED INFORMATION

ute Number:	18001	**Regular Carrier:**	[redacted]
ZIP Code:	[redacted]	**T6/Repl. Carrier:**	
Office Time:	03:33	**Begin:**	07:00 AM
Street Time:	04:33	**Leave:**	10:17 AM
Total Time:	08:06	**Return:**	03:20 PM
		End:	03:30 PM
AM Cased Volume:	1848		
PM Cased Volume:	0	**Average Parcels:**	11
Total Cased Volume:	1848	**Average Accts.:**	2
Possible Deliveries:	414	**DPS %:**	52

Collection Points:

Location	Pickup Time	
	Daily	Saturday

GENERATED BY: LEWIS, JEFF
Customs House 20018, 2001801

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-97. Please provide a sample copy of a Delivery Operations Information System (DOIS) "Route/Carrier Daily Performance Report." Is the name of the report which contains a record of the actual hours worked by a city delivery carrier on the previous day? If not, then please explain the function of the "Route/Carrier Daily Performance Report." Also, please name (and provide a sample copy of) the DOIS report containing the actual hours worked by a carrier on the previous day.

Response

The Route/Carrier Daily Performance/Analysis Report compares the actual workhours used to the projected workhours required. Supervisors generally use the Route/Carrier Daily Performance Report, as you suggest, for comparing the actual results from yesterday's operation to the plan. However, it is available for any of the dates active in DOIS, not just the prior day. Supervisors can select report dates to perform special analyses, for example comparing Saturday operations.

97

Route/ Carrier Daily Performance/Analysis Report

RESTRICTE' 'ORMATION

Delivery U [redacted]

Service Date: 06/08/2005

Service Week: 37

Carrier Type:
U: UAR R: REG TE: TE
C: CAS T: T-6 RT: RTR
P: PTR F: PTF RS: RES

				Mail Volumes						AM Office Assignments						Street Assignments						PM Office			Total Hours			
				Cased		Delivered				Office Hours			Leave Time			Street Hours			Return Time			Office Hours						
Rte	Carrier Name/Type		Assgn	Ltr	Flt	DPS	Seq	Total	PP	Proj	Act	Var	Proj	Act	Var	Proj	Act	Var	Proj	Act	Var	Proj	Act	Var	Proj	Act	Var	OT
18001	[redacted]			227	370	690		1,287	7	1:38	2:59	1:22				4:33	4:56	0:23				0:10	0:00	-0:10	6:21	7:56	1:35	2:44
		F	primary							1:38	2:59	1:22	08:37	11:03	2:26	4:33	4:56	0:23	14:44	19:16	4:34		0:00		6:21	7:56	1:35	2:44
18002				227	446	814		1,487	10	1:46	3:04	1:18				3:29	4:53	1:24				0:10	0:00	-0:10	5:25	7:57	2:32	2:27
		R	primary							1:46	3:04	1:18	10:47	10:07	-0:40	3:29	4:53	1:24	15:59	17:59	2:00		0:00		5:25	7:57	2:32	2:27
18003				284	452	1,024		1,760	8	1:53	1:51	-0:02				3:58	5:29	1:32				0:10	0:01	-0:09	6:01	7:21	1:20	7:27
		R	unknown							0:00	1:51	1:51				0:00	1:30	1:30					0:00		0:00	3:21	3:21	3:57
		R	unknown							0:00	0:00	0:00				0:00	2:29	2:29					0:01		0:00	2:30	2:30	
		R	street							0:00	0:00	0:00				0:25	1:30	1:05					0:00		0:25	1:30	1:05	3:30
18004				284	405	818		1,507	7	1:25	3:02	1:37				4:42	4:28	-0:14				0:10	0:01	-0:09	6:17	7:31	1:14	1:56
		R	primary							1:25	3:02	1:37	08:24	10:31	2:07	4:42	4:28	-0:14	15:57	17:55	1:58		0:01		6:17	7:31	1:14	1:56
18005				284	487	1,134		1,905	8	1:58	2:13	0:15				4:12	1:19	-2:53				0:10	0:00	-0:10	6:20	3:32	-2:48	2:37
		T	office							1:58	2:13	0:15				0:00	0:00	0:00					0:00		2:08	2:13	0:06	2:37
		C	unknown							0:00	0:00	0:00				0:00	0:44	0:44					0:00		0:00	0:44	0:44	
		T	str aux							0:00	0:00	0:00				1:12	0:35	-0:37					0:00		1:12	0:35	-0:37	
18006				170	427	1,072		1,669	11	1:42	2:25	0:43				4:06	5:17	1:11				0:10	0:07	-0:02	5:57	7:49	1:52	
		T	primary							1:42	2:25	0:43	10:48	11:43	0:55	4:06	5:17	1:11	16:37	18:04	1:27		0:07		5:57	7:49	1:52	
18008				284	368	624		1,276	12	1:39	2:37	0:58				4:40	6:07	1:27				0:10	0:12	0:02	6:28	8:55	2:27	0:56
		R	primary							1:39	2:37	0:58	09:38	10:06	0:28	3:28	5:11	1:43	13:36	15:48	2:12		0:12		5:17	8:00	2:43	
		R	unknown							0:00	0:00	0:00				0:00	0:55	0:55					0:00		0:00	0:55	0:55	0:56
18010				341	414	1,128		1,883	9	1:26	2:11	0:45				4:25	2:49	-1:36				0:10	0:22	0:13	6:01	5:22	-0:38	
		R	primary							1:26	2:11	0:45	10:28	11:41	1:13	4:25	2:49	-1:36	17:36	18:04	0:28		0:22		6:01	5:22	-0:38	
18011				227	441	749		1,417	11	1:48	3:17	1:29				4:12	4:56	0:44				0:10	0:01	-0:08	6:10	8:14	2:05	0:14
		F	primary							1:48	3:17	1:29	08:47	10:45	1:58	4:12	4:56	0:44	13:29	16:12	2:43		0:01		6:10	8:14	2:05	0:14
18012				227	418	850		1,495	8	1:44	1:04	-0:41				4:56	5:06	0:10				0:10	0:24	0:14	6:50	6:34	-0:17	
		C	unknown							0:00	1:04	1:04				0:00	5:06	5:06					0:24		0:00	6:34	6:34	
18013				170	448	985		1,603	7	1:45	0:00	-1:45				4:22	1:29	-2:52				0:10	0:00	-0:10	6:16	1:29	-4:46	

GENERATED BY: LEWIS, JEFF
Customs House 20018, 2001801

Route/ Carrier Daily Performance/Analysis Report

RESTRICTE FORMATION

Delivery I [redacted]

Service Date: 06/08/2005

Service Week: 37

Carrier Type:
U: UAR R: REG TE: TE
C: CAS T: T-6 RT: RTR
P: PTR F: PTF RS: RES

				Mail Volumes						AM Office Assignments						Street Assignments						PM Office			Total Hours			
				Cased		Delivered				Office Hours			Leave Time			Street Hours			Return Time			Office Hours						
Rte	Carrier Name/Type		Assgn	Ltr	Flt	DPS	Seq	Total	PP	Proj	Act	Var	Proj	Act	Var	Proj	Act	Var	Proj	Act	Var	Proj	Act	Var	Proj	Act	Var	OT
18013	[redacted]	C	unknown							0:00	0:00	0:00				0:00	1:29	1:29					0:00		0:00	1:29	1:29	
18014				170	371	793		1,334	8	1:34	2:42	1:08				4:48	4:56	0:07				0:10	0:00	-0:10	6:32	7:38	1:06	6:12
		R	primary							1:34	2:42	1:08	08:33	09:42	1:09	2:28	2:30	0:02	11:31	12:42	1:11		0:00		4:12	5:12	1:00	6:12
		R	unknown							0:00	0:00	0:00				0:00	2:26	2:26					0:00		0:00	2:26	2:26	
18015				170	413	647		1,230	10	1:40	2:02	0:22				5:08	4:05	-1:03				0:10	0:00	-0:10	6:57	6:07	-0:50	
		R	primary							1:40	2:02	0:22	08:39	11:14	2:35	5:08	1:16	-3:51	15:57	17:48	1:49		0:00		6:57	3:18	-3:39	
		F	unknown							0:00	0:00	0:00				0:00	2:49	2:49					0:00		0:00	2:49	2:49	
18016				341	422	667		1,430	8	1:35	1:49	0:14				5:09	6:07	0:58				0:10	0:05	-0:05	6:53	8:01	1:08	
		R	primary							1:35	1:49	0:14	09:34	09:53	0:19	5:09	6:07	0:58	16:24	17:25	1:01		0:05		6:53	8:01	1:08	
18017				341	408	835		1,584	8	1:41	1:32	-0:08				4:32	3:16	-1:17				0:10	0:14	0:04	6:22	5:02	-1:21	
		R	primary							1:41	1:32	-0:08	08:40	11:14	2:34	4:32	3:16	-1:17	15:22	17:46	2:24		0:14		6:22	5:02	-1:21	
18018				264	445	820		1,549	8	1:52	0:00	-1:52				4:27	3:01	-1:27				0:10	0:00	-0:10	6:29	3:01	-3:28	1:21
		R	unknown							0:00	0:00	0:00				0:00	1:35	1:35					0:00		0:00	1:35	1:35	
		R	street							0:00	0:00	0:00				0:40	1:26	0:46					0:00		0:40	1:26	0:46	1:21
18019				170	376	715		1,263	7	1:30	2:23	0:53				4:22	5:28	1:05				0:10	0:04	-0:05	6:02	7:55	1:53	
		R	primary							1:30	2:23	0:53	09:30	10:32	1:02	4:22	5:28	1:05	16:35	17:55	1:20		0:04		6:02	7:55	1:53	
18020				170	403	796		1,369	9	1:36	0:00	-1:36				4:04	0:00	-4:04				0:10	0:00	-0:10	5:50	0:00	-5:50	

Route/ Carrier Daily Performance/Analysis Report

RESTRICTI FORMATION

Delivery [redacted]

Service Date: 06/08/2005

Service Week: 37

Unit Totals												
Mail Volumes				**AM Office Hours**		**Street Hours**		**PM Office Hours**		**Total Hours**	
Cased		**Delivered**									
Letters	4,371	DPS	15,161	Projected	30:11	Projected	80:06	Projected	2:53	Projected	113:10
Flats	7,516	Seq	0	Actual	35:12	Actual	73:40	Actual	1:31	Actual	110:23
PP	156	Total	27,048	Variation	5:01	Variation	-6:26			Variation	-2:47
										OT	25:55

GENERATED BY: LEWIS, JEFF
Customs House 20018, 2001801

4822

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-98. Please provide a sample copy of a Delivery Operations Information System (DOIS) "Workhour/Workload Report."

Response

Please see the attached.

98

Workhour Workloa port (by Route)

RESTRICTI ORMATION

Delivery Unit: [redacted]
Date Range: 06/08/2005 - 06/08/2005
Route: 18001
Regular Carrier: [redacted]

		Office Time									Street Time					Total Time				Volumes					
Date	Carrier	Act AM	AM Asst	Proj AM	AM Var	Act PM	PM Asst	Proj PM	PM Var	OEI	Act Str	Str Asst	Proj Str	Str Var	SEI	Act Total	Proj Total	Total Var	TEI	Total Cased Ltr	Total Cased Flt	DPS	Seq	PP	Total Dlvd Pcs
06/08	[redacted]	2:59	0:00	1:38	1:22	0:00	0:00	0:10	-0:10	137.45	4:56	0:00	4:33	0:23	83.19	7:56	6:21	1:35	51.82	227	370	690		4	1,287

	Office Time									Street Time					Total Time				Volumes					
Reg / Repl Averages and Totals	Act AM	AM Asst	Proj AM	AM Var	Act PM	PM Asst	Proj PM	PM Var	OEI	Act Str	Str Asst	Proj Str	Str Var	SEI	Act Total	Proj Total	Total Var	TEI	Total Cased Ltr	Total Cased Flt	DPS	Seq	PP	Total Dlvd Pcs
Regular Averages	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0.00	0:00	0:00	0:00	0:00	0.00	0:00	0:00	0:00	0.00	0	0	0	0	0	0
Repl Averages	2:59	0:00	1:38	1:22	0:00	0:00	0:10	-0:10	137.46	4:56	0:00	4:33	0:23	83.20	7:56	6:21	1:35	51.83	227	370	690	0	4	1,287
Regular Totals	0:00	0:00	0:00	0:00	0:00	0:00	0:00	0:00		0:00	0:00	0:00	0:00		0:00	0:00	0:00		0	0	0	0	0	0
Repl Totals	2:59	0:00	1:38	1:22	0:00	0:00	0:10	-0:10		4:56	0:00	4:33	0:23		7:56	6:21	1:35		227	370	690	0	4	1,287
Route Totals	2:59	0:00	1:38	1:22	0:00	0:00	0:10	-0:10		4:56	0:00	4:33	0:23		7:56	6:21	1:35		227	370	690		4	1,287

Base Information																				Fixed
Office	3:33	AM Ltrs	1,313	PM Ltrs	0	Base % to Std	100	Base Parcels	11	Dly Begin	07:00	Dly Return	15:20	Sat Begin	07:00	Sat Return	15:20	Office Time
Street	4:33	AM Flts	535	PM Flts	0	DPS %	52	Base Rtr Hours	0:00	Dly Leave	10:17	Dly End	15:30	Sat Leave	10:17	Sat End	15:30	0:40

GENERATED BY: LEWIS, JEFF
Customs House 20018, 2001801

4824

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-99. What is the name of the report in the Delivery Operations Information System (DOIS) that records the actual amount of time worked by a carrier on the previous day as opposed to the estimated amount of time to be worked? Please provide a copy of such a report, unless it has already been requested in another interrogatory.

Response

The Workhour Workload Report, requested in OCA/USPS-98, and Route/Carrier Daily Performance/Analysis Report, requested in OCA/USPS-97, (and Miscellaneous Route/Carrier Daily Performance/Analysis Report) compare the actual workhours used to the projected workhours required. These reports are available for any of the dates active in DOIS, not just the prior day.

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-100. Please refer to the attached page of a DOIS report.

a. Please provide, separately for each delivery unit in the ZIP Codes in file AL161ZIPS.prn of LR-K-80, screen shots from DOIS, showing delivery unit totals for Cased Letters, Cased Flats, Delivered Seq, Delivered DPS, PP, and Street Hours Actual for the following time periods: May 15-28, 2005; February 13-26, 2005; November 12-25, 2004; August 13-26, 2004; May 14-27, 2004. If the same data are available on a weekly or pay-period basis, please provide them in lieu of daily data.

b. Please define the following terms: Cased Letters, Cased Flats, Delivered Seq, Delivered DPS, PP.

c. The "Service Date" shown on the attachment is 05/20/2005. Does this mean that the Mail Volumes shown were delivered and the Street Hours were incurred on May 20, 2005? If not, how does one determine the delivery date for mail volumes and the corresponding street hours?

RESPONSE:

a. Objection filed.

b. With reference to the Route/Carrier Daily Performance/Analysis Report attached to the interrogatory:

"Cased Letters" and "Cased Flats" are the volumes of letters and flats cased by the carrier prior to delivery;

"Delivered Seq" is the volume of sequenced mail that the carrier did not case prior to delivery;

Delivered DPS is the volume of DPS sorted letter mail that the carrier delivered; and

"PP" is the volume of Parcel Post that the carrier delivered.

c. The "Service Date" at the top of the report indicates the date to which the reported operational data apply. As such, that date is also the expected delivery date.

Route/ Carrier Daily Perform ce/Analysis Report

Delivery Unit:

RESTRICTED IN MATIC

Service Date: 05/20/2005

Service Week: 34

Carrier Type:
U: UAR R: REG TE: TE
C: CAS T: T-6 RT: RTR
P: PTR F: PTF RS: RES

Rte	Carrier Name/Type		Assgn	Mail Volumes: Cased Ltr	Cased Flt	Delivered DPS	Delivered Seq	Delivered Total	Delivered PP	AM Office Assignments: Office Hours Proj	Office Hours Act	Office Hours Var	Leave Time Proj	Leave Time Act	Leave Time Var	Street Assignments: Street Hours Proj	Street Hours Act	Street Hours Var	Return Time Proj	Return Time Act	Return Time Var	PM Office: Office Hours Proj	Office Hours Act	Office Hours Var	Total Hours Proj	Total Hours Act	Total Hours Var	OT
50058	[redacted]			340	1,178	1,597	509	3,624	21	3:43	6:12	2:29				5:14	4:26	-0:48				0:10	0:16	0:07	9:07	10:54	1:47	2:0
		T	primary							3:43	3:04	-0:39	11:12	10:04	-1:08	5:14	4:26	-0:48	16:56	15:00	-1:56		0:04		9:07	7:34	-1:33	2:0
		R	unknown							0:00	3:08	3:08				0:00	0:00	0:00					0:12		0:00	3:20	3:20	
50057				524	1,782	1,475	611	4,392	29	5:17	2:53	-2:24				5:22	6:25	1:03				0:10	0:00	-0:10	10:49	9:18	-1:31	10:1
		F	primary							5:17	2:53	-2:24	13:16	10:19	-2:57	5:22	6:25	1:03	20:51	18:10	-2:41		0:00		10:49	9:18	-1:31	10:1
50056				937	1,636	5,318	374	8,287	18	5:31	3:25	-2:06				5:06	6:28	1:22				0:10	0:44	0:35	10:46	10:38	-0:09	
		U	primary							5:31	3:25	-2:06	19:00	10:25	-2:35	3:56	3:32	-0:24	17:26	14:27	-2:59		0:03		9:36	7:00	-2:36	
		R	str aux							0:00	0:00	0:00				1:10	1:55	0:45					0:00		1:10	1:55	0:45	
		R	unknown							0:00	0:00	0:00				0:00	1:02	1:02					0:00		0:00	1:02	1:02	
		F	unknown							0:00	0:00	0:00				0:00	0:00	0:00					0:41		0:00	0:41	0:41	
50059				170	259	662	339	1,429	12	1:03	0:00	-1:03				1:42	1:28	-0:14				0:05	0:00	-0:05	2:50	1:28	-1:22	
		R	street							0:00	0:00	0:00				1:42	1:28	-0:14					0:00		1:42	1:28	-0:14	
50060				226	662	697	153	1,738	9	2:03	0:00	-2:03				1:43	0:56	-0:47				0:05	0:57	0:52	3:51	1:53	-1:58	1:5
		R	office							2:02	0:00	-2:02				0:00	0:00	0:00					0:57		2:06	0:57	-1:09	1:5
		F	street							0:00	0:00	0:00				1:43	0:56	-0:47					0:00		1:43	0:56	-0:47	

Unit Totals

Mail Volumes: Cased		Mail Volumes: Delivered	
Letters	23,867	DPS	79,706
Flats	55,572	Seq	19,022
PP	1,017	Total	178,167

AM Office Hours	
Projected	179:39
Actual	184:02
Variation	4:24

Street Hours	
Projected	274:44
Actual	256:31
Variation	-18:13

PM Office Hours	
Projected	13:31
Actual	19:42

Total Hours	
Projected	467:54
Actual	460:19
Variation	-7:35
OT	129:52

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-102. Please refer to the response to DBP/USPS-48, regarding Registered Mail, where it states, in part, "The number of claims, the number of claims paid, and the dollar amount paid for claims do not exactly match the numbers provided in response to DFC/USPS-23 because the response to this interrogatory [DBP/USPS-48] is based on data relating to claims accepted in a fiscal year while the earlier response [to DFC/USPS-23] used data that tracked claims resolved in a fiscal year." Also, please refer to Pages 2 and 3 of the Attachment to DBP/USPS-48. For FY 2000 through FY 2003, please provide number of "Claims Paid" by value category, and the amount of "claims resolved in a fiscal year" by value category.

RESPONSE:

The "Claims Paid" data by category for FY 2002 was presented in the response to DBP/USPS-48, while similar data was provided in FY 2000 and FY 2001 in the response to OCA/USPS-62.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-103. Please refer to the response to OCA/USPS-10(a), which states, in part, "The Sunday/holiday exclusion does not apply to certain Express Mail pieces." Please confirm that the Sunday/holiday exclusion does not apply to Next Day Express Mail delivered to 13,928 ZIP Codes nationwide. If you do not confirm, please explain.

RESPONSE:

Confirmed that the Postal Service delivers Express Mail to 13,928 ZIP Codes nationwide on Sundays and holidays.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-104. Please refer to the response to OCA/USPS-11(b)-(c), which states," Confirmed that the ODIS Quarterly Statistics Reports do not address levels of achieved performance for overnight and second day Express Mail. See the response to DFC/USPS-5." Please confirm that the reference to "DFC/USPS-5" should be"DFC/USPS-6". If you do not confirm, please explain.

RESPONSE:

Confirmed. Appropriate erratum will be filed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-105

Please refer to the response to OCA/USPS-18, and USPS-LR-K-82.

a. Refer to the response to OCA/USPS-18(a), which references DFC/USPS-5 and 7. Other than PETE or ODIS, please identify any other data or measurement system that provides the average number of days to delivery for the mail classes and groups listed in Table 4 of USPS-LR-K-82, and provide the average number of days to delivery for the mail classes and groups listed from such data or measurement systems. If PETE and ODIS are the only data or measurement systems providing this information for the mail classes and groups listed in Table 4 of USPS-LR-K-82, please identify PETE and ODIS as such.

b. Refer to the response to OCA/USPS-18(b), which references DFC/USPS-5 and 7. Please identify any data or measurement system other than ODIS that provides the percentage of mail delivered for Day 1 through Day 10 for each of the mail classes and groups listed in Table 4 of USPS-LR-K-82, and provide the required percentages from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.

c. Refer to the response to OCA/USPS-18(c). Please identify any data or measurement system other than ODIS that permits comparison of First-Class Mail and Priority Mail in terms of the percentage of mail delivered for Day 1 through Day 10, and provide the required percentages from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.

d. Refer to the response to OCA/USPS-18(d), which references DFC/USPS-5 and 7. Please identify any data or measurement system other than ODIS that provides the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, for each of the mail classes and groups listed in Table 5 of USPS-LR-K-82, and provide the required percentages and average number of days from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.

e. Refer to the response to OCA/USPS-18(e). Please identify any data or measurement systems other than ODIS that permit comparison of First-Class Mail and Priority Mail in terms of the percentage of intra-P&DC and inter-P&DC volume, and the average number of days to delivery for such volume, and provide the required percentages and average number of days from such data or measurement systems. If ODIS is the only data or measurement system, please identify ODIS as such.

RESPONSE:

a.-e. No other such data systems exist.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-106. *Please refer to the response to* OCA/USPS-18(c).

a. From a consumer perspective, please confirm that Priority Mail and First-Class Mail have the same service standard, i.e., overnight delivery, 2nd day delivery, or 3rd day delivery. If you do not confirm, please explain.

b. Please confirm that the service standard for Priority Mail and First-Class Mail is the same irrespective of the shape of the mailpiece entered by the postal customer; that is, for the same 3-digit origin-destination ZIP Code pair, a letter-shaped mailpiece and a flat-shaped mailpiece would have the same service standard. If you do not confirm, please explain.

c. Please confirm that the 3-digit origin-destination ZIP Code pairs used for overnight Priority Mail are the same for overnight First-Class Mail. If you do not confirm, please explain, and provide the percentage of 3-digit origin-destination ZIP Code pairs for overnight First-Class Mail that coincide with overnight Priority Mail.

d. Please confirm that the 3-digit origin-destination ZIP Code pairs used for 2nd day Priority Mail are the same for 2nd day First-Class Mail. If you do not confirm, please explain, and provide the percentage of 3-digit origin-destination ZIP Code pairs for 2nd day First-Class Mail that coincide with 2nd Priority Mail.

e. Please confirm that the 3-digit origin-destination ZIP Code pairs used for 3rd day Priority Mail are the same for 3rd day First-Class Mail. If you do not confirm, please explain, and provide the percentage of 3-digit origin-destination ZIP Code pairs for 3rd day First-Class Mail that coincide with 3rd day Priority Mail.

RESPONSE:

a. Not confirmed. While both First-Class Mail and Priority Mail have overnight, 2-day and 3-day service standards, Priority Mail has a larger number of origin-destination pairs with a 2-day service standard than First-Class Mail.

b. Confirmed.

c. Not confirmed. Data forthcoming.

d. Not confirmed. Data forthcoming.

e. Not confirmed. Data forthcoming.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-107. Please refer to the response to DFC/USPS-5(b), and OCA/USPS-14(a), which states, in part, "Priority Mail has a service standard that can be overnight, 2nd day, or 3rd day." Please explain why the Postal Service does not measure the percentage of Priority Mail achieving the 3rd day service standard using PETE.

RESPONSE:

The Postal Service does not use PETE to measure the percentage of Priority Mail achieving the 3rd day service standard because the 3-day destination areas do not represent a significant part of the processing and distribution network which serves the majority of our customers.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-108. Please refer to the response to DFC/USPS-4. Please provide a table showing EXFC on-time service performance by quarter for FY 2002, FY 2003 and FY 2004.

RESPONSE:

Please see the response to DFC/USPS-54.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-109. Please refer to the response to OCA/USPS-27.
a. Refer to the response to OCA/USPS-27(a), where it states, in part, "information on failures can help local staff diagnose and remediate systematic problems." Please define the term "failures" as used in this context, discuss what is being referred to in the phrase "information on failures," cite the table(s), and refer to the specific data on "failures" in the table(s) cited, that "help local staff diagnose and remediate systematic problems," and explain how local staff use the data cited.
b. Refer to the response to OCA/USPS-27(b). Please identify any data or measurement system other than ODIS that provides data on the achieved levels of performance with respect to the 2nd Day, 3rd Day, 4th Day, 5th Day, 6th Day, 7th Day, 8th Day, and 9th Day separately for the Parcel Post, BPM, Media Mail, and Library service standards referred to in response to interrogatory OCA/USPS-26. If ODIS is the only data or measurement system, please identify ODIS as such.

RESPONSE:

a. "Failures" refer to service standard failures. "Information" refers to commercially sensitive, non-public point-to-point ODIS data. A low ODIS time-in-transit score between two points would indicate the need to review operations and transportation related to those locations to find the source of the failures and to implement needed solutions.

b. ODIS is the only such system.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-110. Please refer to the response to OCA/USPS-32(a) - (b).

a. Refer to the first bullet. Please confirm that the special services for which claims may be made by postal customers are: Registered Mail (with insurance) service, Insurance service, and COD service. If you do not confirm, please explain and identify all special services for which claims may be made by postal customers.

b. Refer to the first bullet. Fiscal Years 2002, 2003 and 2004, with respect to each of the special services identified in subpart a. of this interrogatory, please provide the number of claims and percentage of claims paid with respect to properly completed and supported claims prior to day 10, within 10 to 15 days, and subsequent to 15 days, after receipt of claims from post offices where filed.

c. Refer to the second bullet. For Fiscal Years 2002, 2003 and 2004, please provide nationwide data for First-Class Mail parcels and Package Services parcels showing the percent of time that such parcels are delivered within the number of days specified by the applicable service standard, and the average number of days to delivery.

d. Refer to the third bullet. Fiscal Years 2002, 2003 and 2004, with the exception of the period between November 16 and January 1, please provide the number and percentage of mailing lists corrected within 15 working days with respect to the special services Address Changes for Election Boards, Correction of Mailing Lists, and ZIP Coding of Mailing Lists.

RESPONSE:

a. Confirmed

b. The requested data are only available for FY2004. See table below.

Claims Processing Timelines - FY 2004

	9 days or less	10 - 14 Days	15 + Days	Total Processed
Numbered Insured _1/	62,000	2,670	10,130	**74,800**
COD	20,790	520	5,980	**27,290**
Express Mail	2,240	100	500	**2,840**
Registered Mail	220	40	290	**550**
Bulk Insured _2/	170	10	20	**200**
Total	**85,420**	**3,340**	**16,920**	**105,680**

Note: This represents paid claims that were filed correctly at initial submission.

1/ Numbered Insured represents mailings other than Bulk Insured.
2/ Bulk Insured are mailings by business mailers.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

c. Information concerning time to delivery and other aspects of delivery performance is available from barcoded label scans for First-Class Mail parcels with Delivery Confirmation or Signature Confirmation, when the pieces receive both an acceptance scan and a delivery scan. The information for First-Class Mail derives from incomplete data sets which are still under development. As a result, the data are not necessarily indicative of delivery performance for all First-Class Mail pieces, or even for all First-Class Mail parcels with Delivery Confirmation or Signature Confirmation. In particular, year-to-year comparisons are not considered to be reliable. The Postal Service does not have data on service performance using delivery confirmation data for FY 2002; for FY 2003 only a limited number of records are available and these records are incomplete. The table below presents the data for FY 2004 for First-Class Mail with Delivery Confirmation for on-time service percentage. Average days to delivery for First-Class Mail parcels with Delivery Confirmation is not available.

First-Class Mail with Delivery Confirmation
FY 2004

Service Standard	On-Time Performance
One Day	77.81 %
Two-Day	70.93 %
Three-Day	67.50 %

For data on Package Services, please see the response to DFC/USPS-11.

d. These data are not collected.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-111. Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 26, where it refers to the Phoenix-Hecht Postal Survey.

a. Does the Postal Service consider the Phoenix-Hecht Postal Survey an objective, statistically validated measurement system for end-to-end (entry to exit at remittance processor's receiving destination) service performance for First-Class remittance mail? Please explain.

b. To what extent does the Postal Service use the Phoenix-Hecht Postal Survey to measure the end-to-end service performance for First-Class remittance mail? Please explain.

RESPONSE:

(a) Unlike, EXFC or PETE, which are designed and operated for the Postal Service by independent contractors, the Phoenix-Hecht Postal Survey is not conducted on behalf of the Postal Service. The Postal Service receives survey results as a subscriber. Questions regarding the statistical validity and objectivity of the survey should be directed to Phoenix- Hecht. The Postal Service regards the Phoenix-Hecht Postal Survey as an attempt to assess lockbox performance, an essential element of which is mail delivery.

(b) The Postal Service does not regard the results as representative of remittance mail service nationwide. However, Operations and Product Management organizations use the survey results as a general indicator of remittance mail processing and delivery performance. The survey data are used by both departments and local mail processing managers identify potential opportunities for improving remittance mail processing and delivery.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-112

Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, and Exhibit 2-2., "First-Class Mail Service Standard Improvement," at page 27.

a. Please refer to the row "PQ 2 -00," column "3-Day Service." Please confirm that the entry 683,218 should equal 683,153 (849,043 - 8,744 - 157,081). If you do not confirm, please explain. If you do confirm, please explain the cause of the discrepancy between Exhibit 2-2 and your answer.

b. Refer to the row "Change +/-," column "Total Pairs." Please show the distribution of the 1,844 3-digit ZIP Code pairs to the 1-day service, 2-day service, and 3-day service columns.

c. For the period PQ 2 2000 to PQ 2 2003, please provide the number of 3-digit ZIP Code pairs that:
   i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
   i. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
   ii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.

d. For the period PQ 2 2000 to PQ 2 2003, please provide the percentage of First-Class Mail volume associated with the 3-digit ZIP Code pairs that:
   i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
   ii. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
   iii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.

RESPONSE:

a. Not confirmed. When the data were provided for inclusion in the Strategic Plan, the 3-Day total of 683,281 had the final two digits transposed to incorrectly read "683,218". That typographical error accounts for the discrepancy in Exhibit 2-2 of the Strategic Plan.

b. N/A

c. i. upgraded from 3-day to: 2-day: 49,262; upgraded from 2-day to 1-day: 16.

   ii. upgraded from 2-day to 1-day: 35; downgraded from 2-day to 3-day: 26,889.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

RESPONSE to OCA/USPS-112 (continued):

iii. downgraded from 1-day to 2-day: 33; downgraded from 1-day to 3-day: 3.

d. The Postal Service is determining whether a response can be developed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-113. Please refer to the Postal Service's Five Year Strategic Plan for Fiscal Years 2004-2008, at page 87, where it states, in part, "The Express Mail Validation System (EMVS) is an external validation of Express Mail service performance. EMVS provides a side-by-side service standard comparison of Express Mail test pieces with PTS [Product Tracking System]." Please provide the same level of detail with respect to EMVS as is provided for EXFC and PETE for the following: "Indicator," "Scope," "Statistical Reliability," "Limitations," "Source" and "Data Verification and Validity."

RESPONSE:

Express Mail Validation System (EMVS)

Indicator: External validation of Express Mail service performance

Scope:

EMVS is designed to provide quarterly data of Express Mail performance. The EMVS study uses actual Express Mail pieces (using standard Postal Service Express Mail envelopes) that are indistinguishable from all other Express Mail volume. Service time is tracked from the time mail is deposited in a collection box or at a Post Office in order to provide a view of service from the customer's perspective.

The system was established in PQ III, FY 2002 to provide a comparison of test mail results against PTS for transit time, customer label service standards and customer receipt of Attempt-to-deliver (ATD) notices.

Statistical Reliability:

EMVS is a quarterly, Area-based, destination-based system, with the sample sizes set to achieve estimates of on-time performance for each area. Nationally, 4,320 pieces of

test mail will be created each quarter. In order to achieve the +/- 4% precision level desired at the area level, each of the nine areas (including Capital Metro) should receive at least 384 pieces, the minimum number of pieces required to achieve the precision level.

Limitations:

EMVS is an area level study measuring overnight service standards only. Inductions and receipts occur in EXFC or PETE 3-digit ZIP Codes only. EMVS is not tested during a holiday exclusion period. For FY 05 that period covered eleven weeks beginning Saturday, November 20th through Friday, February 4th.

Source:

EMVS is designed and operated by a contractor as an independent, objective validation of Express Mail service performance.

Data verification and validity:

All non-matches, ATD gaps, late mailpieces and mailpieces with alternate delivery scans undergo special investigations by the contractor, including follow-up interviews with both droppers and reporters, data reviews cross-checking for patterns that suggest errors, validation of induction times through receipts for postage (when inducted at a window unit) as well as project manager reviews.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-114

Please refer to the response to USPS-LR-K-117, "First-Class Mail Service Standard Changes."

a. For PQ 4 of 2002, please confirm that the Postal Service upgraded 40 First-Class Mail 3-digit ZIP Code pairs from 3-day service standard to 2-day service. If you do not confirm, please explain.
b. For PQ 4 of 2002, please provide the percentage of First-Class Mail volume associated with the 40 3-digit ZIP Code pairs that were upgraded.
c. During FY 2002, did the Postal Service upgrade or downgrade any other First-Class Mail 3-digit ZIP Code pairs? If so, please provide for each service standard, the number of 3-digit ZIP Code pairs that were upgraded or downgraded, and the percentage of First-Class Mail volume associated with these upgraded and downgraded 3-digit ZIP Code pairs.
d. For PQ 1 of 2003, please confirm that the Postal Service upgraded 106 First-Class Mail 3-digit ZIP Code pairs from 3-day service standard to 2-day service, and downgraded 90 ZIP Code pairs from 2-day service standard to 3-day service standard. If you do not confirm, please explain.
e. For PQ 1 of 2003, please provide the percentage of First-Class Mail volume associated with the 106 3-digit ZIP Code pairs that were upgraded, and the 90 3-digit ZIP Code pairs that were downgraded.
f. During FY 2004, did the Postal Service upgrade or downgrade any First-Class Mail 3-digit ZIP Code pairs? If so, please provide for each service standard, the number of 3-digit ZIP Code pairs that were upgraded or downgraded, and the percentage of First-Class Mail volume associated with these 3-digit ZIP Code pairs.
g. For PQ 2 of 2005, please confirm that the Postal Service upgraded 20 First-Class Mail 3-digit ZIP Code pairs from 2-day service standard to 1-day service, and downgraded 9 ZIP Code pairs from 1-day service standard to 2-day service standard. If you do not confirm, please explain.
h. For PQ 2 of 2005, please provide the percentage of First-Class Mail volume associated with the 20 3-digit ZIP Code pairs that were upgraded, and the 9 3-digit ZIP Code pairs that were downgraded.

RESPONSE:

a. Confirmed.

b. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by the 40 3-digit ZIP Code pairs referenced in subpart (a) during FY 02, Quarter 4. An effort is underway to compile such data.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

RESPONSE to OCA/USPS-114 (continued):

c. Because of the data archiving problems described in response to DBP/USPS-4, the Postal Service is unable to respond here beyond the scope indicated in response to that interrogatory, meaning that it will only be able to provide the Quarter 4.data in response to subpart (b).

d. Confirmed.

e. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by the 106 upgraded and the 90 downgraded 3-digit ZIP Code pairs referenced in subpart (d) during FY 03, Quarter 1. An effort is underway to compile such data.

f. As indicated in Library Reference K-117, there were 20 First-Class Mail upgrades and 197 downgrades made during FY 04, Quarter 4. The Postal Service interprets the question as seeking the estimated percentage of total originating and total destinating First-Class Mail volumes represented by the 20 upgraded and the 197 downgraded 3-digit ZIP Code pairs referenced in subpart (e) during FY 03, Quarter 1. An effort is underway to compile such data.

g. Confirmed.

h. The Postal Service interprets the question as seeking total originating and total destinating First-Class Mail volumes estimated by ODIS to travel between the 20 3-digit ZIP Code upgraded pairs and the 9 downgraded pairs referenced in subpart (g) during FY 05, Quarter 2. An effort is underway to compile such data.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-115. Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part,

> For example, many major mailers or mailing services use CONFIRM service to track the performance of some categories of Standard Mail pieces and Delivery Confirmation service to track Parcel Select performance. While these indicators are useful for the Postal Service and for participating customers in identifying potential areas for service improvement, the data is not statistically representative for all mailers and for the mail category.

a. Please identify the mail "categories of Standard Mail pieces" for which CONFIRM service is used to track service performance.
b. Please identify the "indicators useful for the Postal Service," and explain how those indicators are useful.
c. Please confirm that the data generated by CONFIRM service is "statistically representative" for the mail "categories of Standard Mail pieces" identified in subpart a., above? If you do confirm, please provide the statistically representative results for the mail categories of Standard Mail. If you do not confirm, please provide the results currently available to track service performance. Also, please explain and address the following:
    i. Has the Postal Service undertaken any analysis of the data generated by CONFIRM service to determine the requirements or changes necessary to make the data "statistically representative" for the mail "categories of Standard Mail pieces" identified in subpart a., above? Please provide any such analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the CONFIRM service data "statistically representative."
    ii. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by CONFIRM service "statistically representative" for the mail "categories of Standard Mail pieces" identified in subpart a., above? Please explain.

RESPONSE:

a. CONFIRM is eligible for use with all Standard Mail categories, as long as the mailpieces are automation compatible and letter-size or flat-size.

b. See USPS-T-1/MC20002-1 at 4. CONFIRM data permit the analysis of intervals between mail processing steps. As such, unusual delays would suggest the potential existence of a problem in mail processing operations that could be investigated. As

quoted above, evidence of such delays is "useful for the Postal Service and for participating customers in identifying potential areas for service improvement."

c. Not confirmed. CONFIRM is currently available to subscribers who obtain CONFIRM information as a consequence of their subscription. CONFIRM was not designed or intended to produce "statistically representative" indications of performance. Further, there are no plans to attempt to produce "statistically representative" indications of performance. See also the response to part (b).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-116. Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part,

> For example, many major mailers or mailing services use CONFIRM service to track the performance of some categories of Standard Mail pieces and Delivery Confirmation service to track Parcel Select performance. While these indicators are useful for the Postal Service and for participating customers in identifying potential areas for service improvement, the data is not statistically representative for all mailers and for the mail category.

a. Please confirm that the data generated by Delivery Confirmation and/or Signature Confirmation service is "statistically representative" for Parcel Select? If you do confirm, please provide the statistically representative results for Parcel Select. If you do not confirm, please provide the results currently available to track service performance.
b. Has the Postal Service undertaken an analysis of the data generated by Delivery Confirmation and/or Signature Confirmation service to determine the requirements or changes necessary to make the data "statistically representative" for Parcel Select? Please provide such an analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the Delivery Confirmation and/or Signature Confirmation service data "statistically representative."
c. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by Delivery Confirmation and/or Signature Confirmation service "statistically representative" for Parcel Select? Please explain.

RESPONSE:

a. Not confirmed. Please see the response to DFC/USPS-11.

b. No.

c. None. There are no plans to do so, since the purpose of the data is to provide information to the participating Parcel Select drop shippers and address any issues regarding the service that the Postal Service is providing to them.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-117. Please refer to the Postal Service's Five-Year Strategic Plan for Fiscal Years 2004-2008, at page 28, where it states, in part, "Currently, 498 publishers have registered 2,169 publications in the ePUBWATCH system, which tracks problems with Periodicals mail."

a. How many publishers are currently registered in the ePUBWATCH system?

b. How many publications are currently registered in the ePUBWATCH system?

c. Please confirm that the data generated by ePUBWATCH system is "statistically representative" for Periodicals Mail. If you do confirm, please provide the statistically representative results for Periodicals Mail. If you do not confirm, please provide the results currently available to track service performance. Also, please explain and address the following:

   i. Has the Postal Service undertaken any analysis of the data generated by the ePUBWATCH system to determine the requirements or changes necessary to make the data "statistically representative" for Periodicals Mail? Please provide any such analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the ePUBWATCH system data "statistically representative."
   ii. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by ePUBWATCH system "statistically representative" for Periodicals Mail? Please explain.

RESPONSE:

a. 1,132

b. 4,540

c. The ePUBWATCH system is not statistically representative. It was not designed to be statistically representative, and does not function as a service performance measure. It is a customer service tool developed to replace and enhance the old paper-based publication watch system. The only publications tracked are from registered ePUBWATCH users. ePUBWATCH does not track every publication of a

registered publisher, or even every issue or mailing of a tracked publication, and does not provide service performance information.

i. No. Please see response to part c.

ii. Not applicable. Please see response to part c.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-118. Please refer to the Postal Service's response to OCA/USPS-103 in Docket No. R2001-1, and the attachments thereto. For Fiscal Year (FY) 2002, 2003, 2004, and the available quarters of FY 2005, please provide the ODIS-based percent and frequency (i.e., "known delivery days" volume) delivered within 1 to 20 days for

a. Parcel Post;
b. Bound Printed Matter;
c. Media Mail; and
d. Library Mail.

RESPONSE:

a-d. A partial objection was filed on June 13, 2005. See the attached tables.

PP

FY 2002 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	31	72	87	93	96
THREE-DAY	6	25	52	72	83
FOUR-DAY	1	8	28	54	73
FIVE-DAY	1	5	16	38	60
SIX-DAY	0	3	7	17	34
SEVEN-DAY	0	3	5	10	21
EIGHT-DAY	0	3	4	6	16
NINE-DAY	6	15	21	26	29

PP

FY 2002 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	97	98	99	99	100
THREE-DAY	90	94	96	97	100
FOUR-DAY	84	90	94	96	100
FIVE-DAY	76	85	91	95	100
SIX-DAY	55	71	84	91	100
SEVEN-DAY	37	53	71	82	100
EIGHT-DAY	28	42	62	79	100
NINE-DAY	33	37	41	45	100

PP

FY 2002 KNOWN DELIVERY DAYS VOLUME	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	21,181,612	6,479,210	15,248,242	18,471,470	19,748,979	20,306,127
THREE-DAY	14,953,562	889,447	3,750,089	7,808,575	10,763,003	12,475,878
FOUR-DAY	16,716,947	211,358	1,287,628	4,608,437	9,040,684	12,179,947
FIVE-DAY	8,632,393	65,423	418,292	1,351,346	3,249,171	5,193,126
SIX-DAY	5,945,427	21,029	179,820	437,932	1,018,439	2,040,361
SEVEN-DAY	4,161,987	8,430	105,699	206,519	403,308	877,081
EIGHT-DAY	1,502,529	4,916	41,491	66,575	95,133	233,116
NINE-DAY	2,809,548	178,211	425,896	590,172	716,975	813,625

PP

FY 2002 KNOWN DELIVERY DAYS VOLUME

	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	20,592,044	20,774,857	20,914,678	20,979,024	21,181,612
THREE-DAY	13,457,286	13,999,590	14,354,308	14,554,058	14,953,562
FOUR-DAY	14,094,012	15,078,603	15,737,226	16,124,302	16,716,947
FIVE-DAY	6,559,938	7,327,691	7,873,586	8,181,925	8,632,393
SIX-DAY	3,275,354	4,230,431	4,977,593	5,390,567	5,945,427
SEVEN-DAY	1,557,142	2,193,347	2,945,741	3,425,837	4,161,987
EIGHT-DAY	420,866	624,272	926,954	1,183,143	1,502,529
NINE-DAY	940,660	1,042,530	1,165,424	1,267,272	2,809,548

PP FY2003	PERCENT DELIVERED IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	31	73	88	94	97
THREE-DAY	6	26	54	74	86
FOUR-DAY	1	8	29	55	75
FIVE-DAY	1	5	15	37	59
SIX-DAY	0	4	8	18	36
SEVEN-DAY	0	3	5	10	21
EIGHT-DAY	0	3	5	7	15
NINE-DAY	9	20	28	33	38

PP FY 2003	PERCENT DELIVERED IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	98	99	99	99	100
THREE-DAY	92	95	97	98	100
FOUR-DAY	85	91	95	97	100
FIVE-DAY	75	83	90	93	100
SIX-DAY	56	71	84	91	100
SEVEN-DAY	39	56	73	84	100
EIGHT-DAY	28	42	63	78	100
NINE-DAY	42	46	51	56	100

PP FY 2003	KNOWN DELIVERY DAYS VOLUME TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	20,039,526	6,210,291	14,558,174	17,693,952	18,843,506	19,381,726
THREE-DAY	11,259,589	688,030	2,955,700	6,128,801	8,386,185	9,663,814
FOUR-DAY	19,824,369	213,332	1,589,749	5,664,068	10,936,543	14,859,213
FIVE-DAY	11,477,554	73,662	541,649	1,742,932	4,236,056	6,776,214
SIX-DAY	9,304,125	38,600	369,170	704,783	1,686,843	3,385,946
SEVEN-DAY	7,056,182	15,743	201,201	354,956	671,102	1,509,549
EIGHT-DAY	2,366,480	6,618	70,314	112,746	170,611	347,575
NINE-DAY	2,723,084	257,350	541,658	759,602	901,451	1,038,212

PP

FY 2003 KNOWN DELIVERY DAYS VOLUME

	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	19,659,808	19,800,142	19,873,351	19,911,964	20,039,526
THREE-DAY	10,342,299	10,673,804	10,913,845	11,023,106	11,259,589
FOUR-DAY	16,936,131	18,075,467	18,816,432	19,213,830	19,824,369
FIVE-DAY	8,628,224	9,577,578	10,297,980	10,697,104	11,477,554
SIX-DAY	5,191,986	6,573,699	7,770,032	8,442,242	9,304,125
SEVEN-DAY	2,786,914	3,972,573	5,176,461	5,936,910	7,056,182
EIGHT-DAY	661,109	1,001,743	1,498,675	1,852,160	2,366,480
NINE-DAY	1,141,520	1,246,553	1,382,490	1,517,342	2,723,084

PP

FY 2004 PERCENT DELIVERED IN	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	32	76	89	94	96
THREE-DAY	7	27	57	77	88
FOUR-DAY	1	8	31	60	79
FIVE-DAY	0	5	17	43	67
SIX-DAY	0	3	7	20	40
SEVEN-DAY	0	2	5	10	23
EIGHT-DAY	0	2	4	7	17
NINE-DAY	0	1	1	1	3

PP

FY 2004 PERCENT DELIVERED IN	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	98	98	99	99	100
THREE-DAY	94	96	97	98	100
FOUR-DAY	89	93	96	97	100
FIVE-DAY	81	88	94	96	100
SIX-DAY	61	75	87	93	100
SEVEN-DAY	42	59	78	88	100
EIGHT-DAY	33	47	66	81	100
NINE-DAY	8	16	31	45	100

PP

FY 2004 KNOWN DELIVERY DAYS VOLUME	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	23,342,949	7,392,007	17,638,257	20,829,088	21,952,905	22,489,975
THREE-DAY	11,074,922	736,918	2,962,193	6,265,722	8,542,154	9,742,948
FOUR-DAY	20,213,627	193,232	1,706,434	6,188,047	12,150,525	15,903,365
FIVE-DAY	11,702,914	54,565	597,373	2,028,297	5,072,873	7,786,377
SIX-DAY	8,900,555	12,669	249,022	629,136	1,775,972	3,570,500
SEVEN-DAY	6,129,238	15,637	144,306	287,782	597,446	1,394,539
EIGHT-DAY	1,828,307	1,479	35,271	68,401	120,921	304,064
NINE-DAY	71,372	0	770	770	770	2,323

PP

FY 2004 KNOWN DELIVERY DAYS VOLUME

	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	22,761,418	22,942,498	23,044,036	23,100,848	23,342,949
THREE-DAY	10,361,365	10,626,873	10,780,489	10,872,789	11,074,922
FOUR-DAY	17,962,353	18,846,272	19,400,302	19,690,825	20,213,627
FIVE-DAY	9,433,495	10,343,807	10,988,640	11,290,518	11,702,914
SIX-DAY	5,454,505	6,691,239	7,745,784	8,235,492	8,900,555
SEVEN-DAY	2,583,829	3,640,853	4,752,147	5,402,314	6,129,238
EIGHT-DAY	596,698	862,004	1,205,665	1,479,652	1,828,307
NINE-DAY	5,556	11,650	21,918	32,041	71,372

BPM

FY2002 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	45	74	85	91	93
THREE-DAY	6	32	53	69	79
FOUR-DAY	1	11	35	56	70
FIVE-DAY	1	8	22	40	57
SIX-DAY	0	5	13	24	37
SEVEN-DAY	0	2	18	29	37
EIGHT-DAY	0	2	21	24	34
NINE-DAY	7	10	13	57	59

BPM

FY 2002 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	95	96	97	98	100
THREE-DAY	84	87	91	93	100
FOUR-DAY	79	85	89	91	100
FIVE-DAY	71	78	83	88	100
SIX-DAY	52	66	77	84	100
SEVEN-DAY	50	61	70	79	100
EIGHT-DAY	42	52	68	83	100
NINE-DAY	60	63	64	67	100

BPM

FY 2002 KNOWN DELIVERY	DAYS VOLUME				
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	6,867,366	3,084,504	5,111,023	5,869,684	6,215,853	6,418,623
THREE-DAY	3,004,073	177,387	950,701	1,598,363	2,065,737	2,370,225
FOUR-DAY	3,401,492	33,830	385,065	1,180,262	1,911,165	2,367,779
FIVE-DAY	1,982,599	11,740	155,706	428,744	785,186	1,123,013
SIX-DAY	1,440,610	1,548	76,692	187,041	347,656	539,202
SEVEN-DAY	947,587	805	15,783	169,227	278,794	353,868
EIGHT-DAY	281,176	939	6,727	58,285	68,483	96,440
NINE-DAY	271,534	18,147	26,611	36,276	154,516	159,796

BPM

FY 2002	KNOWN DELIVERY	DAYS VOLUME				
		6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY		6,553,259	6,603,214	6,660,083	6,719,504	6,867,366
THREE-DAY		2,519,946	2,618,517	2,722,522	2,789,875	3,004,073
FOUR-DAY		2,670,865	2,882,536	3,018,434	3,099,827	3,401,492
FIVE-DAY		1,401,606	1,544,894	1,651,923	1,741,632	1,982,599
SIX-DAY		755,545	951,486	1,113,650	1,213,792	1,440,610
SEVEN-DAY		469,304	575,392	666,488	749,226	947,587
EIGHT-DAY		119,323	146,309	190,588	232,133	281,176
NINE-DAY		162,373	171,207	175,041	181,584	271,534

BPM

FY 2003 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	44	78	88	92	95
THREE-DAY	5	36	60	74	83
FOUR-DAY	2	17	39	57	69
FIVE-DAY	0	6	25	43	59
SIX-DAY	1	12	24	41	54
SEVEN-DAY	1	9	21	34	42
EIGHT-DAY	0	10	24	32	40
NINE-DAY	13	34	39	50	55

BPM

FY 2003 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	96	98	98	98	100
THREE-DAY	87	90	93	94	100
FOUR-DAY	76	81	85	88	100
FIVE-DAY	68	75	80	86	100
SIX-DAY	66	76	82	87	100
SEVEN-DAY	54	63	74	84	100
EIGHT-DAY	51	61	77	86	100
NINE-DAY	57	58	64	66	100

BPM

FY 2003 KNOWN DELIVERY DAYS VOLUME	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	6,684,083	2,967,672	5,217,646	5,868,627	6,163,612	6,366,071
THREE-DAY	3,046,581	143,528	1,111,218	1,812,861	2,256,683	2,515,162
FOUR-DAY	3,389,916	73,141	569,362	1,309,836	1,915,584	2,353,959
FIVE-DAY	1,804,423	4,214	115,326	453,159	772,671	1,057,504
SIX-DAY	1,651,959	11,488	190,719	400,128	670,475	898,091
SEVEN-DAY	953,269	8,430	86,161	204,624	327,476	400,613
EIGHT-DAY	362,918	0	37,722	85,831	114,459	143,722
NINE-DAY	223,600	29,115	76,877	86,360	112,147	122,504

BPM

FY 2003 KNOWN DELIVERY DAYS VOLUME

	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	6,446,205	6,517,432	6,557,609	6,578,668	6,684,083
THREE-DAY	2,657,631	2,744,480	2,819,798	2,862,722	3,046,581
FOUR-DAY	2,575,771	2,734,745	2,881,298	2,981,295	3,389,916
FIVE-DAY	1,235,085	1,348,972	1,452,098	1,547,337	1,804,423
SIX-DAY	1,097,450	1,247,456	1,353,556	1,430,869	1,651,959
SEVEN-DAY	516,022	597,312	708,397	802,564	953,269
EIGHT-DAY	183,945	221,087	278,517	312,953	362,918
NINE-DAY	127,022	129,974	142,458	148,172	223,600

FY 2004	PERCENT DELIVERED IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	40	76	87	92	94
THREE-DAY	11	38	63	76	84
FOUR-DAY	2	16	45	65	76
FIVE-DAY	0	7	28	48	66
SIX-DAY	1	7	19	34	47
SEVEN-DAY	0	4	20	31	41
EIGHT-DAY	0	6	26	36	48
NINE-DAY	0	0	0	52	52

FY 2004	PERCENT DELIVERED IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	96	98	98	99	100
THREE-DAY	87	91	94	96	100
FOUR-DAY	84	88	92	94	100
FIVE-DAY	77	82	86	88	100
SIX-DAY	61	71	81	88	100
SEVEN-DAY	54	65	79	86	100
EIGHT-DAY	56	65	74	87	100
NINE-DAY	52	59	66	94	100

FY 2004	KNOWN DELIVERY DAYS VOLUME					
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	7,314,863	2,915,281	5,531,559	6,399,159	6,723,695	6,891,981
THREE-DAY	2,820,531	319,929	1,060,553	1,771,764	2,155,039	2,377,820
FOUR-DAY	3,569,179	74,074	565,988	1,614,235	2,320,256	2,715,168
FIVE-DAY	2,004,909	6,294	146,995	563,303	962,083	1,317,506
SIX-DAY	1,607,792	8,480	114,838	310,072	541,496	759,587
SEVEN-DAY	801,032	1,877	35,252	157,510	246,471	326,292
EIGHT-DAY	363,071	55	20,383	93,209	130,080	173,886
NINE-DAY	11,174	0	0	0	5,757	5,757

FY 2004 KNOWN DELIVERY DAYS VOLUME

	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	7,003,765	7,132,833	7,191,375	7,222,181	7,314,863
THREE-DAY	2,465,294	2,564,341	2,639,501	2,696,153	2,820,531
FOUR-DAY	3,001,848	3,127,804	3,270,115	3,365,152	3,569,179
FIVE-DAY	1,544,666	1,651,962	1,717,957	1,763,640	2,004,909
SIX-DAY	986,627	1,142,880	1,300,810	1,412,096	1,607,792
SEVEN-DAY	432,612	517,512	631,650	690,724	801,032
EIGHT-DAY	205,112	234,523	269,801	316,636	363,071
NINE-DAY	5,757	6,560	7,426	10,449	11,174

MM

FY 2002 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	36	71	84	90	93
THREE-DAY	6	27	51	68	79
FOUR-DAY	1	9	31	56	72
FIVE-DAY	0	4	16	38	60
SIX-DAY	0	3	9	19	36
SEVEN-DAY	0	3	7	13	24
EIGHT-DAY	1	3	6	8	15
NINE-DAY	3	6	9	13	16

MM

FY 2002 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	95	96	97	98	100
THREE-DAY	86	90	93	95	100
FOUR-DAY	83	88	91	94	100
FIVE-DAY	75	84	90	93	100
SIX-DAY	55	70	82	90	100
SEVEN-DAY	39	54	70	81	100
EIGHT-DAY	28	41	58	73	100
NINE-DAY	20	24	31	37	100

MM

FY 2002 KNOWN DELIVERY	DAYS VOLUME				
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	20,181,290	7,178,303	14,263,230	16,979,544	18,119,982	18,730,488
THREE-DAY	14,518,493	819,714	3,861,724	7,441,054	9,892,454	11,439,126
FOUR-DAY	19,498,885	143,334	1,718,206	5,990,486	10,866,384	14,136,672
FIVE-DAY	11,996,060	39,883	536,247	1,950,168	4,613,613	7,256,453
SIX-DAY	10,734,093	21,986	314,723	941,914	2,075,960	3,899,795
SEVEN-DAY	8,821,516	24,371	246,379	660,187	1,162,705	2,118,164
EIGHT-DAY	3,773,596	19,466	126,992	224,518	311,523	573,402
NINE-DAY	1,430,814	47,914	78,866	133,191	179,296	233,851

MM

FY 2002 KNOWN DELIVERY	DAYS VOLUME				
	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	19,134,140	19,383,601	19,584,985	19,725,900	20,181,290
THREE-DAY	12,478,087	13,085,153	13,485,082	13,739,467	14,518,493
FOUR-DAY	16,152,452	17,211,637	17,836,322	18,340,206	19,498,885
FIVE-DAY	8,976,180	10,020,529	10,769,813	11,151,383	11,996,060
SIX-DAY	5,942,934	7,476,927	8,833,603	9,614,260	10,734,093
SEVEN-DAY	3,454,360	4,776,981	6,151,554	7,161,332	8,821,516
EIGHT-DAY	1,041,338	1,548,477	2,171,619	2,752,608	3,773,596
NINE-DAY	283,691	336,849	443,670	529,285	1,430,814

MM

FY 2003 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	35	72	85	91	94
THREE-DAY	6	29	55	74	84
FOUR-DAY	1	9	30	55	74
FIVE-DAY	0	5	18	40	60
SIX-DAY	0	3	9	20	37
SEVEN-DAY	0	3	8	13	25
EIGHT-DAY	0	3	6	9	16
NINE-DAY	3	8	13	17	20

MM

FY 2003 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	96	97	98	98	100
THREE-DAY	89	92	95	96	100
FOUR-DAY	83	88	92	95	100
FIVE-DAY	74	82	88	92	100
SIX-DAY	56	70	82	89	100
SEVEN-DAY	42	57	72	83	100
EIGHT-DAY	29	44	64	81	100
NINE-DAY	24	28	32	40	100

MM

FY 2003 KNOWN DELIVERY	DAYS VOLUME				
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	21,497,456	7,590,848	15,411,702	18,331,770	19,579,800	20,277,880
THREE-DAY	16,297,034	1,006,351	4,647,356	8,911,321	12,021,625	13,673,209
FOUR-DAY	22,874,059	205,369	1,987,579	6,880,508	12,670,248	16,813,321
FIVE-DAY	14,627,994	56,301	777,256	2,620,416	5,795,217	8,816,896
SIX-DAY	13,270,749	35,804	410,485	1,212,207	2,610,496	4,905,260
SEVEN-DAY	11,069,032	39,609	379,412	859,130	1,461,141	2,806,531
EIGHT-DAY	4,802,470	6,857	157,578	296,262	434,535	778,757
NINE-DAY	1,353,635	47,340	108,242	172,858	225,883	275,994

MM

FY 2003 KNOWN DELIVERY	DAYS VOLUME				
	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	20,629,132	20,828,723	21,014,490	21,147,000	21,497,456
THREE-DAY	14,557,566	15,045,197	15,458,348	15,657,133	16,297,034
FOUR-DAY	19,086,889	20,231,585	21,078,629	21,702,077	22,874,059
FIVE-DAY	10,841,437	12,003,379	12,922,794	13,428,642	14,627,994
SIX-DAY	7,419,767	9,339,871	10,945,988	11,849,077	13,270,749
SEVEN-DAY	4,665,840	6,329,473	7,976,409	9,190,257	11,069,032
EIGHT-DAY	1,411,121	2,117,766	3,062,487	3,870,712	4,802,470
NINE-DAY	330,134	375,235	438,050	536,981	1,353,635

MM

FY 2004 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	35	74	87	92	94
THREE-DAY	5	27	55	74	84
FOUR-DAY	1	8	31	59	77
FIVE-DAY	0	4	19	45	65
SIX-DAY	0	3	9	21	41
SEVEN-DAY	0	3	8	13	27
EIGHT-DAY	0	2	6	9	18
NINE-DAY	0	0	1	3	7

MM

FY 2004 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	96	97	98	98	100
THREE-DAY	89	93	95	97	100
FOUR-DAY	87	91	94	96	100
FIVE-DAY	79	87	92	95	100
SIX-DAY	60	74	85	92	100
SEVEN-DAY	44	61	77	87	100
EIGHT-DAY	33	45	64	82	100
NINE-DAY	18	21	41	70	100

MM

FY 2004 KNOWN DELIVERY	DAYS VOLUME				
TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	23,565,330	8,170,226	17,437,146	20,563,839	21,689,069	22,254,258
THREE-DAY	16,000,983	725,372	4,364,216	8,736,168	11,882,419	13,509,813
FOUR-DAY	25,568,507	171,122	1,928,626	7,927,451	15,178,586	19,747,181
FIVE-DAY	16,229,921	55,308	714,266	3,081,981	7,239,091	10,536,621
SIX-DAY	13,902,175	28,806	435,168	1,239,911	2,985,171	5,649,110
SEVEN-DAY	11,371,293	56,344	328,443	948,179	1,522,226	3,082,021
EIGHT-DAY	4,225,674	14,188	93,626	248,884	394,874	752,732
NINE-DAY	106,618	0	244	1,485	3,394	7,201

MM

FY 2004 KNOWN DELIVERY DAYS VOLUME

	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	22,656,862	22,858,391	23,015,663	23,183,669	23,565,330
THREE-DAY	14,317,389	14,822,189	15,221,501	15,455,365	16,000,983
FOUR-DAY	22,169,086	23,353,558	24,148,483	24,530,274	25,568,507
FIVE-DAY	12,813,898	14,073,617	14,926,264	15,376,086	16,229,921
SIX-DAY	8,335,466	10,301,246	11,865,324	12,772,285	13,902,175
SEVEN-DAY	5,018,637	6,919,687	8,794,008	9,900,171	11,371,293
EIGHT-DAY	1,409,562	1,920,695	2,687,020	3,446,089	4,225,674
NINE-DAY	18,729	22,529	43,327	74,918	106,618

LIB

FY 2002 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	41	76	87	92	94
THREE-DAY	10	33	59	75	82
FOUR-DAY	2	12	37	61	75
FIVE-DAY	1	7	20	42	63
SIX-DAY	0	3	9	21	38
SEVEN-DAY	0	5	9	15	26
EIGHT-DAY	0	1	9	16	21
NINE-DAY	7	14	21	32	33

LIB

FY 2002 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	96	97	98	99	100
THREE-DAY	88	92	94	96	100
FOUR-DAY	85	90	93	95	100
FIVE-DAY	75	83	90	94	100
SIX-DAY	55	69	82	90	100
SEVEN-DAY	43	57	72	82	100
EIGHT-DAY	31	47	67	78	100
NINE-DAY	34	36	39	42	100

LIB

FY 2002 KNOWN DELIVERY DAYS VOLUME	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	5,811,888	2,385,561	4,401,754	5,081,765	5,326,098	5,476,136
THREE-DAY	2,532,955	260,947	848,507	1,487,158	1,896,102	2,081,338
FOUR-DAY	2,433,769	50,312	300,817	896,175	1,473,018	1,836,564
FIVE-DAY	1,346,117	8,010	92,733	266,119	571,655	851,564
SIX-DAY	1,021,015	1,590	31,756	92,653	217,001	385,142
SEVEN-DAY	605,152	1,250	30,263	56,378	93,711	160,019
EIGHT-DAY	232,937	0	2,747	20,800	37,185	48,936
NINE-DAY	194,693	13,110	26,944	40,725	62,646	63,935

LIB

FY 2002 KNOWN DELIVERY	DAYS VOLUME				
	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	5,560,385	5,609,552	5,669,492	5,727,748	5,811,888
THREE-DAY	2,236,941	2,323,493	2,373,176	2,433,701	2,532,955
FOUR-DAY	2,070,813	2,183,438	2,274,617	2,316,329	2,433,769
FIVE-DAY	1,013,309	1,121,599	1,215,573	1,260,457	1,346,117
SIX-DAY	560,854	703,469	840,118	921,998	1,021,015
SEVEN-DAY	262,040	343,431	435,481	495,853	605,152
EIGHT-DAY	71,723	108,655	155,164	181,483	232,937
NINE-DAY	66,858	70,614	75,913	82,467	194,693

LIB

FY 2003 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	41	75	88	93	95
THREE-DAY	10	38	63	77	84
FOUR-DAY	1	11	33	55	71
FIVE-DAY	1	7	19	39	59
SIX-DAY	1	5	11	22	38
SEVEN-DAY	0	5	9	16	27
EIGHT-DAY	0	11	16	18	38
NINE-DAY	12	18	24	25	27

LIB

FY 2003 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	97	98	98	99	100
THREE-DAY	88	91	93	94	100
FOUR-DAY	81	87	90	94	100
FIVE-DAY	70	79	85	89	100
SIX-DAY	55	70	83	90	100
SEVEN-DAY	43	57	69	77	100
EIGHT-DAY	50	59	72	80	100
NINE-DAY	29	37	41	46	100

LIB

FY 2003 KNOWN DELIVERY	DAYS VOLUME				
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	5,160,500	2,106,145	3,884,988	4,533,772	4,777,993	4,911,044
THREE-DAY	2,412,650	237,291	916,199	1,510,476	1,855,530	2,026,996
FOUR-DAY	2,305,410	33,688	256,820	753,593	1,263,451	1,638,168
FIVE-DAY	1,286,900	6,825	85,179	241,771	507,265	757,783
SIX-DAY	998,691	7,157	45,139	107,796	219,185	376,547
SEVEN-DAY	627,160	2,303	29,544	55,518	100,283	169,409
EIGHT-DAY	295,605	530	33,342	46,257	52,000	112,175
NINE-DAY	175,303	21,278	32,343	41,202	44,222	47,090

LIB

FY 2003 KNOWN DELIVERY DAYS VOLUME

	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	4,983,862	5,034,763	5,069,364	5,089,094	5,160,500
THREE-DAY	2,127,268	2,195,690	2,245,268	2,266,032	2,412,650
FOUR-DAY	1,872,055	1,996,993	2,077,197	2,163,917	2,305,410
FIVE-DAY	899,278	1,014,898	1,098,289	1,140,276	1,286,900
SIX-DAY	548,254	701,673	826,816	896,025	998,691
SEVEN-DAY	270,861	358,206	435,437	481,894	627,160
EIGHT-DAY	146,711	173,287	211,746	235,529	295,605
NINE-DAY	51,458	64,571	71,540	79,852	175,303

LIB

FY 2004 PERCENT DELIVERED	IN 1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	46	79	89	93	95
THREE-DAY	10	38	61	77	84
FOUR-DAY	2	14	40	65	80
FIVE-DAY	1	6	21	46	63
SIX-DAY	0	4	16	28	46
SEVEN-DAY	0	6	9	14	26
EIGHT-DAY	0	4	12	16	29
NINE-DAY	0	0	0	0	12

LIB

FY 2004 PERCENT DELIVERED	IN 6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	96	97	98	98	100
THREE-DAY	90	93	95	97	100
FOUR-DAY	86	91	94	95	100
FIVE-DAY	78	85	90	95	100
SIX-DAY	59	73	85	91	100
SEVEN-DAY	43	55	67	78	100
EIGHT-DAY	44	58	70	85	100
NINE-DAY	12	25	87	97	100

LIB

FY 2004 KNOWN DELIVERY	DAYS VOLUME				
	TOTAL	1 DAY	2 DAYS	3 DAYS	4 DAYS	5 DAYS
TWO-DAY	5,364,742	2,445,779	4,240,563	4,796,098	4,997,898	5,105,768
THREE-DAY	2,018,088	205,114	757,326	1,234,375	1,563,017	1,705,100
FOUR-DAY	2,353,267	39,220	337,744	930,038	1,535,871	1,874,082
FIVE-DAY	1,160,808	6,965	74,388	245,857	533,547	735,435
SIX-DAY	878,093	3,712	38,781	143,612	245,656	403,141
SEVEN-DAY	535,157	0	30,310	45,718	76,691	136,777
EIGHT-DAY	143,883	0	5,216	17,424	23,560	41,311
NINE-DAY	7,192	0	0	0	0	878

LIB

FY 2004 KNOWN DELIVERY	DAYS VOLUME				
	6 DAYS	7 DAYS	8 DAYS	9 DAYS	10-30 DAYS
TWO-DAY	5,158,690	5,220,937	5,257,306	5,267,755	5,364,742
THREE-DAY	1,824,451	1,873,358	1,912,651	1,966,684	2,018,088
FOUR-DAY	2,030,944	2,150,708	2,214,006	2,241,847	2,353,267
FIVE-DAY	908,712	989,858	1,044,193	1,097,094	1,160,808
SIX-DAY	522,093	638,457	744,388	794,934	878,093
SEVEN-DAY	227,679	296,918	360,527	419,546	535,157
EIGHT-DAY	63,513	83,668	101,228	121,618	143,883
NINE-DAY	878	1,767	6,233	6,977	7,192

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-119. Please refer to the response to DFC/USPS-4, and the table "EXFC On Time Percentage by Service Standard." For FY 2004, please rank order and discuss the most important factors causing the Postal Service's failure to achieve the:

a. Overnight service standard for 4.73 percent of overnight committed First-Class Mail;
b. Two-Day service standard for 8.69 percent of two-day committed First-Class Mail; and
c. Three Day service standard for 11.16 percent of three-day committed First-Class Mail.

RESPONSE:

(a)-(c) Either for EXFC test mail pieces or First-Class Mail in general, the Postal Service has no data on which to base such rankings. Common reasons for late First-Class Mail include such phenomena as missortation, misdelivery, processing and (non-weather-related) transportation delays, adverse weather impacts on transportation and delivery, and missed collections.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-120. Please refer to the response to DFC/USPS-4:

a. Please provide a table showing the First-Class Mail EXFC Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

b. Please provide a table showing the First-Class Mail ODIS-RPW or ODIS On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.

c. Please provide a table showing First-Class Mail ODIS-RPW or ODIS Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

RESPONSE:

a.

External First-Class Measurement System
Average Days to Delivery

FY 2002

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	1.14	1.13	1.11	1.11
Two-Day	2.12	2.11	2.10	2.01
Three-Day	3.28	3.22	3.00	2.85

FY 2003

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	1.11	1.10	1.09	1.09
Two-Day	2.00	2.01	1.97	1.96
Three-Day	2.82	2.92	2.84	2.78

FY 2004

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	1.09	1.08	1.08	1.09
Two-Day	1.97	1.97	1.96	1.97
Three-Day	2.90	2.86	2.79	2.79

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

Response to OCA/USPS-120 (continued)

b.

First-Class Mail Service Performance
ODIS-RPW

FY 2002

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	88.80	88.98	89.89	90.44
2 DAY	79.28	78.96	82.36	85.50
3 DAY	70.50	71.31	79.94	84.47

FY 2003

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	88.52	90.03	89.69	90.21
2 DAY	84.51	83.38	85.16	85.85
3 DAY	83.96	78.99	83.85	85.73

FY 2004

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	90.16	88.72	89.41	89.40
2 DAY	87.03	84.54	85.93	86.01
3 DAY	81.17	83.05	86.32	85.95

FY 2004 data are from ODIS-RPW. Starting in
FY 2004 quarters are calendar month-based.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

Response to OCA/USPS-120 (continued)

c.

First-Class Mail Days to Delivery
ODIS-RPW

FY 2002

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	1.18	1.17	1.16	1.14
2 DAY	2.18	2.17	2.10	2.02
3 DAY	3.27	3.21	2.96	2.79

FY 2003

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	1.17	1.15	1.15	1.14
2 DAY	2.05	2.06	2.04	2.02
3 DAY	2.83	2.94	2.83	2.78

FY 2004

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	1.15	1.18	1.16	1.16
2 DAY	2.00	2.05	2.03	2.05
3 DAY	2.91	2.87	2.80	2.81

FY 2004 data are from ODIS-RPW. Starting in
FY 2004 quarters are calendar month-based.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-121. Please refer to the response to DFC/USPS-5, and the table "PETE On Time Percentage, by Service Standard." For FY 2004, please rank order and discuss the most important factors causing the Postal Service's failure to achieve the:

a. Overnight service standard for 7.31 percent of overnight committed Priority Mail; and
b. Two-Day service standard for 10.56 percent of two-day committed Priority Mail.

RESPONSE:

(a)-(b) Either for PETE test mail pieces or Priority Mail in general, the Postal Service has no data on which to base such rankings. Common reasons for late Priority Mail include such phenomena as missortation, misdelivery, processing and (non-weather-related) transportation delays, adverse weather impacts on transportation and delivery, and missed collections.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-122. Please refer to the response to DFC/USPS-5.

a. Please provide a table showing the Priority Mail ODIS-RPW or ODIS On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.
b. Please provide a table showing the Priority Mail ODIS-RPW or ODIS Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.
c. Please provide a table showing the Priority Mail PETE On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.
d. Please provide a table showing Priority Mail PETE Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

RESPONSE:

a.

Priority Mail Service Performance
ODIS-RPW

FY 2002

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	80.49	77.71	82.38	84.36
2 DAY	58.07	54.99	73.44	80.23
3 DAY	43.64	44.07	72.03	78.97

FY 2003

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	83.87	82.24	84.48	84.75
2 DAY	81.54	70.49	81.71	83.60
3 DAY	79.10	63.33	76.39	77.35

FY 2004

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	82.57	83.64	84.62	84.29
2 DAY	72.61	79.81	82.47	82.62
3 DAY	66.43	73.45	72.99	73.69

FY 2004 data are from ODIS-RPW. Starting in FY 2004 quarters are calendar month-based.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

Response to OCA/USPS-122 (continued)

b.

Priority Mail Service Days to Delivery
ODIS-RPW

FY 2002

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	1.33	1.41	1.31	1.29
2 DAY	2.79	2.82	2.32	2.20
3 DAY	4.58	4.48	3.18	2.94

FY 2003

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	1.27	1.29	1.26	1.25
2 DAY	2.17	2.38	2.19	2.14
3 DAY	2.92	3.37	2.99	2.96

FY 2004

Service Standard	Quarter 1	Quarter 2	Quarter 3	Quarter 4
1 DAY	1.30	1.27	1.25	1.28
2 DAY	2.37	2.21	2.15	2.17
3 DAY	3.27	3.06	3.06	3.09

FY 2004 data are from ODIS-RPW. Starting in
FY 2004 quarters are calendar month-based.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

Response to OCA/USPS-122 (Continued)

c.

Priority Mail End-to-End Measurement System
On Time Percentage

FY 2002

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	89.00	85.46	92.12	92.34
Two-Day	62.81	60.45	81.20	87.76

FY 2003

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	92.62	89.71	92.52	93.46
Two-Day	88.85	78.91	90.11	91.19

FY 2004

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	91.20	92.23	93.37	93.65
Two-Day	83.19	88.78	91.99	91.90

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-122. Please refer to the response to DFC/USPS-5.

a. Please provide a table showing the Priority Mail ODIS-RPW or ODIS On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.

b. Please provide a table showing the Priority Mail ODIS-RPW or ODIS Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

c. Please provide a table showing the Priority Mail PETE On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.

d. Please provide a table showing Priority Mail PETE Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

RESPONSE:

d.

Priority Mail End-to-End Measurement System
Average Days to Delivery

FY 2002

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	1.16	1.22	1.12	1.11
Two-Day	2.61	2.61	2.17	2.04

FY 2003

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	1.10	1.15	1.10	1.10
Two-Day	2.02	2.20	2.01	1.98

FY 2004

Service Standard	Quarter I	Quarter II	Quarter III	Quarter IV
Overnight	1.13	1.12	1.10	1.09
Two-Day	2.12	2.03	1.97	1.99

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-123. Please refer to the response to DFC/USPS-6.

a. For Express Mail Post Office to Addressee and Post Office to Post Office, please provide a table showing the On Time Percentage by Service Standard by quarter for FY 2002, FY 2003 and FY 2004.

b. For Express Mail Post Office to Addressee and Post Office to Post Office, please provide a table showing the Average Days to Delivery by service standard by quarter for FY 2002, FY 2003 and FY 2004.

RESPONSE:

a) See below. This data is derived from the Product Tracking System (PTS). Please note that only partial year data is available for FY 2002.

	Quarter	Next Day	Second Day
Post Office to Addressee	2002Q4	93%	95%
	2003Q1	91%	92%
	2003Q2	94%	93%
	2003Q3	95%	95%
	2003Q4	96%	96%
	2004Q1	92%	93%
	2004Q2	95%	95%
	2004Q3	96%	96%
	2004Q4	96%	96%
Post Office to Post Office	2002Q4	95%	95%
	2003Q1	94%	94%
	2003Q2	95%	94%
	2003Q3	96%	95%
	2003Q4	96%	96%
	2004Q1	95%	94%
	2004Q2	96%	95%
	2004Q3	97%	96%
	2004Q4	97%	96%

b) See below. This data is derived from the Product Tracking System (PTS). Please note that only partial year data is available for FY 2002.

	Quarter	Next Day	Second Day
Post Office to Addressee	2002Q4	0.95	1.45
	2003Q1	0.97	1.55
	2003Q2	0.95	1.49

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

	2003Q3	0.93	1.47
	2003Q4	0.93	1.44
	2004Q1	0.97	1.53
	2004Q2	0.93	1.47
	2004Q3	0.92	1.44
	2004Q4	0.93	1.46
	2002Q4	0.87	1.32
	2003Q1	0.88	1.41
	2003Q2	0.87	1.37
Post Office	2003Q3	0.85	1.34
to	2003Q4	0.86	1.31
Post Office	2004Q1	0.88	1.36
	2004Q2	0.86	1.35
	2004Q3	0.85	1.31
	2004Q4	0.85	1.33

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-124. *Please refer to the response to* DBP/USPS-10(b), regarding retail window services on Sundays in some cities. Consider three postal customers that utilize retail window services where available on Sundays in some cities. One customer enters a Next Day Express Mail piece, the second enters a Second Day Express Mail piece, and the third enters a Priority Mail piece to a ZIP Code with a 3-day service standard. There are no holidays on Monday, Tuesday, or Wednesday.

a. For the Next Day Express Mail piece, please confirm that (i) the day of acceptance by the Postal Service is Sunday, and (ii) the piece will be delivered on Monday, satisfying the Next Day service standard. If you do not confirm, please explain.
b. For the Second Day Express Mail piece, please confirm that (i) the day of acceptance by the Postal Service is Sunday, and (ii) the piece will be delivered on Tuesday, satisfying the Second Day service standard. If you do not confirm, please explain.
c. For the Priority Mail piece, please confirm that (i) the day of acceptance by the Postal Service is Sunday, and (ii) the piece will be delivered on Wednesday, satisfying the 3-day service standard. If you do not confirm, please explain.

RESPONSE:

(a)(i) Confirmed

(a)(ii) Confirmed that the guaranteed date of delivery would be Monday so long as the piece was entered by the cut-off time for guaranteed Next Day delivery and Next Day delivery was available to the destination ZIP Code.

(b)(i) Confirmed.

(b)(ii) Confirmed that the guaranteed date of delivery would be Tuesday so long as the piece was entered by the cut-off time for guaranteed Second Day delivery.

(c)(i) Confirmed, if the Priority Mail piece is postmarked or metered on that Sunday.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

(c)(ii) Not confirmed as written. In order for this piece to meet the three day service standard, it would have to be delivered by Wednesday, but there is nor a guarantee that it will be delivered by Wednesday.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-125. Please refer to the response to DFC/USPS-44. For FY 2001 through FY 2004, please provide the percentage of First-Class Mail destined to one-day, two-day, and three-day delivery areas according to the First-Class Mail service standards.

RESPONSE:

See the response to DFC/USPS-43.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-126. For FY 2004, with respect to each category or type of First-Class Mail:

a. Please provide the percent and number of pieces that are misdelivered. Please identify the data system or the source of the data used.
b. Please provide the percent and number of pieces that are damaged. Please identify the data system or the source of the data used.
c. Please provide the percent and number of pieces that are lost. Please identify the data system or the source of the data used.

RESPONSE:

a.-c. There are no postal data systems in which such information is recorded.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-127. For FY 2004, with respect to Priority Mail:

a. Please provide the percent and number of pieces that are misdelivered. Please identify the data system or the source of the data used.
b. Please provide the percent and number of pieces that are damaged. Please identify the data system or the source of the data used.
c. Please provide the percent and number of pieces that are lost. Please identify the data system or the source of the data used.

RESPONSE:

(a)-(c) The requested information is not available.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-128. For FY 2004, with respect to Return Receipt service, please provide the number of days for the return receipt to be:

a. received by mail, where the return receipt is requested at the time of mailing; and
b. received electronically, where the return receipt is requested at the time of mailing.

RESPONSE:

The Postal Service does not have the data to determine the number of days between the day of mailing and the day a return receipt is received by mail, or received electronically.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-129. With respect to CONFIRM service for First-Class Mail,

a. Please confirm that the data generated by CONFIRM service is "statistically representative" for First-Class Mail. If you do confirm, please provide the statistically representative results for First-Class Mail. If you do not confirm, please provide the results currently available to track service performance.
b. Has the Postal Service undertaken any analysis of the data generated by CONFIRM service to determine the requirements or changes necessary to make the data "statistically representative" for First-Class Mail? Please explain. Please provide any such analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the CONFIRM service data "statistically representative."
c. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by CONFIRM service "statistically representative" for First-Class Mail? Please explain.

RESPONSE:

See the response to OCA/USPS-115.

a) Not confirmed. Confirm data are not statistically representative of any mail volume. Nor can Confirm data track system performance if such tracking is defined as end-to-end transit through the mail stream. Confirm can track mail pieces from the point of entry, or from the first piece of mail processing equipment encountered, to its processing on the last piece of mail processing equipment prior to delivery. Confirm customers find this information, available on a subscription basis, is sufficient for their business purposes. Confirm data are also used internally to analyze mail flow: A consistent and substantial delay between two sequential processing steps, for example, could lead to examination of mail processing among and between those steps in the hope of resolving some processing sub-optimality.

b-c) No. Confirm is not a sampling system and its users self select; there is no expectation that its results could or should be statistically representative of mail volume.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-130. With respect to CONFIRM service for Periodicals Mail,

a. Please confirm that the data generated by CONFIRM service is "statistically representative" for Periodicals Mail. If you do confirm, please provide the statistically representative results for Periodicals Mail. If you do not confirm, please provide the results currently available to track service performance.
b. Has the Postal Service undertaken any analysis of the data generated by CONFIRM service to determine the requirements or changes necessary to make the data "statistically representative" for Periodicals Mail? Please explain. Please provide any such analysis, or any other reports, studies, or other documents addressing the requirements or changes necessary to make the CONFIRM service data "statistically representative."
c. What policy changes or other actions has the Postal Service taken, or have been identified that need to be undertaken, to make the data generated by CONFIRM service "statistically representative" for Periodicals Mail? Please explain.

RESPONSE:

See the responses to OCA/USPS-115 and 129. Those responses are accurate with respect to any class or subclass of mail.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-131. The following interrogatory concerns CONFIRM service.

a. Please confirm that the following data elements are available from CONFIRM service: (i) date of mailing, (ii) date of delivery, (ii) date of first handling at a P&DC, (iv) date of delivery sortation at a P&DC, (v) origin ZIP Code, and (vi) destination ZIP Code.

b. Please identify any other data elements available from CONFIRM service.

RESPONSE:

Somewhat confirmed. If the first scan for a given outgoing mailpiece with Confirm derives from pre-shipment notification, that scan is sometimes characterized as providing a date of mailing, or "start the clock" scan, because if often coincides with an actual date of mailing. The first scan may occur using a handheld scanner (see the third paragraph below). Similarly, if the last scan occurs on the last piece of mail processing equipment upstream from delivery, that scan provides an inferential path to the day of actual delivery. However, these scans are not directly comparable to dates of mailing or delivery provided by a true end-to-end measurement system; for any given mail piece, such scans may correspond to an actual date of mailing or delivery.

The actual data elements that Confirm subscribers receive (scan data) include: the 5-digit ZIP Code of facility where mailpiece processing event took place; 3-digit Operation Code number that indicates sort operation type of processing event; date/time when a mailpiece processing event took place; delivery destination (*i.e.*, POSTNET) code digits obtained from the mailpiece; and tracking barcode (*i.e.*, PLANET Code) digits obtained from the mailpiece.

In addition, when outgoing mailers follow Confirm requirements to submit pre-shipment notifications and provide "start the clock" documentation for Confirm mail induction, a subscriber receives information containing the 5-Digit ZIP Code and facility name where induction took place (as generated from hand-held scanners), date and

time of induction, and the Shipment ID barcode digits obtained from the induction documentation. Experienced subscribers analyze Confirm data together with information from other resources (such as knowledge of mail processing operations) to make inferences that emulate the data elements listed in part (a).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-132. Please refer to the response of the United States Postal Service to OCA/USPS-T10-2(c) – (d), redirected from witness Waterbury.

a. Refer to the sentence that states, in part, "there has been a continuous *increase* in Registry pieces delivered on rural routes, as opposed to a continuous *decrease* in national level (RPW) Registry pieces." (emphasis original). What is causing the continuous increase in Registry pieces delivered on rural routes? Does it follow from the quote above that there is a continuous *decrease* in Registry pieces delivered on city delivery routes? Please explain. Are postal customers on rural routes more likely to use Registered Mail than postal customers generally? Please explain. Or, are postal customers on rural routes "average" users of Registered Mail, but there are an increasing number of postal customers moving into areas served by rural routes? Please explain.

b. Please confirm that the unit cost of C/S 10 (rural carriers) increased by 249.5 percent between BY 2000 and FY 2004. (*See* the response of witness Meehan to OCA/USPS-T10-1(a), redirected from witness Waterbury.) If you do not confirm, please explain.

RESPONSE:

a. There has been an increase in international registry mail delivered on rural routes over the time period 2000 – 2004. There has not been a continuous decrease in registry pieces (which includes international registry pieces) delivered on city delivery letter routes. The city carrier system has no way of separating domestic and international registry pieces in the time period 2000 – 2004.

While the number of rural routes has increased over the years, the determination or willingness of customers on rural routes to use registry is unknown.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

Response to OCA/USPS-132 (continued)

b. Not confirmed. It was determined that the international rural carrier registry pieces were inadvertently included in the domestic rural carrier registry costs in both BY 2000 and FY 2004. The corrected percentage should be 121.1 percent. The following table provides corrected costs and percentage changes.

The following table shows revised C/S 10 Registered costs with Rural Carrier System (RCS) International Registry moved out of Domestic Registry for both 2000 and 2004

	C/S 10 Volume Variable Registry Costs $(000)	C/S 10 Unit Cost
BY 2000	1,691	$ 0.19
BY 2004	2,101	$ 0.42
% change	24.2%	121.1%

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-133. Please refer to Table 1, below, entitled "Expected Actual Delivery Day for Express Mail Based Upon Next Day or Second Day Service Commitment and Day of Mailing," which is intended to be used as a guide to consumers. Please confirm that Table 1 and the notes thereto are accurate. If you do not confirm, please explain and make whatever changes are deemed appropriate to improve the accuracy of this guide.

Table 1
Expected Actual Delivery Day for Express Mail Based Upon Next Day or Second Day Service Commitment and Day of Mailing

Table 1.A.
Day of Mailing (prior to published "Drop-Off" Times)

Service Commitments _1/	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Next Day_2/	TUESDAY	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	SUNDAY	MONDAY

Table 1.B.
Day of Mailing (prior to published "Drop-Off" Times)

Service Commitments _3/	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday	Sunday
Second Day_4/	WEDNESDAY	THURSDAY	FRIDAY	SATURDAY	MONDAY	TUESDAY	TUESDAY
"2nd Delivery Day"	THURSDAY	FRIDAY	SATURDAY	MONDAY	TUESDAY	WEDNESDAY	WEDNESDAY

Notes:
1/ Next Day Express Mail service is determined by the ZIP Code of mailing (origin ZIP Code) and the ZIP Code of receipt (destination ZIP Code), referred to as the ZIP Code "pair."
2/ Next Day Express Mail Service is available to many ZIP Code "pairs" for items mailed during the week, Monday through Friday. For items mailed on Saturday, or where the "Next Day" falls on a federal holiday, Next Day Express Mail service to the same ZIP Code "pairs" may not be available. In such circumstances, customers will be informed that the item can be mailed as Second Day Express Mail service (*see* Table 1.B.).
3/ Second Day Express Mail is never delivered on Sundays or federal holidays.
4/ To determine the expected actual delivery day for Second Day Express Mail service: do not count the day of mailing or any days that are Sundays or federal holidays. The expected actual delivery day will be the "2nd Delivery Day," as shown in Table 1.B. Consequently, the "2nd Delivery Day" could be 3 or 4 calendar days after the day of mailing if the "Second Day" or the intervening day is a Sunday or a federal holiday. For example, a Second Day Express Mail item mailed on Friday would "normally" be delivered on Monday, the third calendar day. That same item mailed on Friday would be delivered on Tuesday, the fourth calendar day, where Monday is also a federal holiday.

RESPONSE:

The Postal Service does not confirm Table 1.B and its accompanying footnotes 3 and 4. First, the statement in Footnote 3 that "Second Day Express Mail is never delivered on Sundays or federal holidays" is incorrect. Second, there are two service commitments for Express Mail under the DMCS—Next Day and Second Day; when the second day falls on a Sunday or holiday, and the destination ZIP Code does not deliver Express Mail on Sundays or holidays, then the Second Day piece would be delivered on the "Second Delivery Day." Therefore, an Express Mail article for which a Next Day commitment is not available would receive a "Second Day" commitment and would be

delivered on the second calendar day, unless the second calendar falls on a Sunday or holiday and the destination ZIP Code does not deliver Express Mail or Sundays or holidays (in which case the piece would be delivered on the "Second Delivery Day").

Assuming that when you talk about "Service Commitments" you are referring to the "Next Day," "Second Day," and "Second Delivery Day" boxes on Label 11-B, Table 1.B is incorrect. For example, an article sent on a Friday whose Label 11-B is checked "Second Day" would be delivered on Sunday, and an article sent on a Saturday whose Label 11-B is checked "Second Day" would be delivered on Monday. An article sent on a Friday whose Label 11-B is checked "Second Delivery Day" may be delivered on Monday or Tuesday, depending on whether Monday is a holiday. An article sent on Saturday to a destination in which a Next Day commitment is unavailable would either be delivered on Monday (and thus have its Label 11-B checked "Second Day") or on Tuesday (and thus have its Label 11-B checked "Second Delivery Day"), as the Postal Service is unaware of any circumstances in which both Monday and Tuesday would be a holiday.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-134. Please refer to the response to OCA/USPS-63, regarding the volume of Post Office to Addressee Express Mail derived from the Product Tracking System (PTS).

(a) Please confirm that the total FY 2004 volume of Post Office to Addressee Express Mail derived from the PTS used to calculate the 4.4 percent noted in response to DBP/USPS-25 is 52,946,54 [sic] (2,329,666 / 0.044). If you do not confirm, please explain and provide the correct number.

(b) Please explain and reconcile the difference between the FY 2004 Post Office to Addressee volume of 54,383,250 from the Express Mail Billing Determinants and the total FY 2004 volume of Post Office to Addressee Express Mail derived from the PTS.

(c) Please explain why the Postal Service used the total FY 2004 volume of Post Office to Addressee Express Mail derived from the PTS rather than the total volume of Post Office to Addressee from the FY 2004 Express Mail Billing Determinants (USPS-LR-K-77) in calculating the percentage of delivery failures.

RESPONSE:

(a) Not confirmed. The FY 2004 Express Mail Post Office to Addressee volume as reported in the Product Tracking System (PTS) and used to calculate the 4.4% failure rate in the response to DBP/USPS-25 is 52,778,605 (2,329,666/52,778,605=0.04414).

(b) The FY 2004 Billing Determinants Express Mail Post Office to Addressee volume figure is based on weight levels derived from the Revenue, Pieces and Weight (RPW) report, with estimates developed separately by Express Mail label type and weight, and is reconciled to the annual RPW numbers. The Post Office to Addressee volume figure from the PTS, meanwhile, is based on an actual piece count.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

(c) The Billing Determinants data does not separate Next Day and Second Day Post Office to Addressee volume, while the PTS data does. Thus, the PTS data allows for the provision of more detailed data.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-135. Please refer to the response to OCA/USPS-64, where it states "The Postal Service does not maintain information regarding the cause of particular Express Mail delivery failures."

(a) Is it fair to conclude from the response that the Postal Service is satisfied with the 4.4 percent delivery failure rate in FY 2004 for Post Office to Addressee Express Mail? Please explain.

(b) Is it fair to conclude from the response that the Postal Service is not interested in trying to determine the most important factors causing the 4.4 percent delivery failure rate in FY 2004 for Post Office to Addressee Express Mail? Please explain.

(c) Is it fair to conclude from the response that the Postal Service has no idea as to the most important factors causing the 4.4 percent delivery failure rate in FY 2004 for Post Office to Addressee Express Mail? Please explain.

RESPONSE:

(a)-(c) No, such conclusions would not be fair. Service performance diagnostics as well as remedial action for identified problems are entrusted to Postal Service field personnel who are in the best position to identify and correct deficiencies. To the extent they are unable to remedy any problems, they request network changes through Headquarters.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-136 Please refer to the response to OCA/USPS-65, regarding Express Mail delivery failures.

(a) For FY 2003, please confirm that the total volume of Post Office to Addressee Express Mail derived from the PTS is 53,387,207 (2,776,522/ 0.053). If you do not confirm, please explain and provide the correct number.

(b) Please provide the total volume of Post Office to Addressee Express Mail from the FY 2003 Express Mail Billing Determinants.

(c) For the period from late August 2002 to September 30, 2002, please confirm that the total volume of Post Office to Addressee Express Mail derived from the PTS is 5,023,796 (271,285 / 0.054). If you do not confirm, please explain and provide the correct number.

RESPONSE:

(a) Not confirmed. The FY 2003 total Express Mail Post Office to Addressee volume as reported in the PTS and used to derive the 5.3% failure rate in the response to OCA/USPS-65 is 52,613,891 (2,776,522/52,613,891=0.05277).

(b) The total FY 2003 Express Mail Post Office to Addressee volume as reported in the FY 2003 Express Mail Billing Determinants is 55,328,575.

(c) Not confirmed. For the period of late August 2002 to September 30, 2002, the Express Mail Post Office to Addressee volume as reported in the PTS was 5,018,116. This is the calculation for the 5.4% failure rate reported for this period (271,285/5,018,116=0.05406).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-137. Please refer to the response to OCA/USPS-66(b), regarding Express Mail refunds and potential monetary exposure.

(a) Please confirm that the figures $46.8 million for FY 2003 and $49.2 million for FY 2002 represent potential monetary exposure. If you do not confirm, please explain.

(b) Please provide the total amount of Express Mail refunds for FY 2002 and FY 2003.

RESPONSE:

(a) Confirmed that the figures represent the estimated potential monetary exposure. Please note that for FY 2002, the Postal Service has incomplete PTS data, and therefore estimated the potential monetary exposure by using the failure rate for the period for which it has PTS data (late August to September 30, 2002) and the Express Mail volume as reported in the FY 2002 Revenue, Pieces, and Weight (RPW) report.

(b) The Postal Service lacks such data for FY 2002. For FY 2003, the Express Mail refund payout was $1.4 million.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-138. Please refer to the response to DBP/USPS-81(b). For FY 2002 and FY 2003, please provide the number of articles of numbered insured mail, the number of claims resolved, and the number of claims paid.

RESPONSE:

The requested data are provided in the following table. The number of claims resolved includes claims paid and claims denied. The numbers of claims resolved and paid include only those claims that were processed at the St. Louis Accounting Service Center, and may not include all numbered insured claims that were locally adjudicated.

Numbered Insured Mail Data

Fiscal Year	Volume	Number of Claims Resolved	Number of Claims Paid
2002	28,533,633	163,000	122, 000
2003	27,965,849	145,000	110, 000

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-139. Refer to the response to DFC/USPS-5, regarding Priority Mail service standards.
a) For FY 2002, FY 2003, and FY 2004, please provide the number of 3-digit ZIP Code pairs that were:

i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
ii. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
iii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.

b) For FY 2002, FY 2003, and FY 2004, please provide the percentage of Priority Mail volume associated with the 3-digit ZIP Code pairs that were:

i. upgraded from 3-day service (a) to 2-day service and (b) to 1-day service;
ii. (a) upgraded from 2-day service to 1-day service and (b) downgraded to 3-day service; and
iii. downgraded from 1-day service (a) to 2-day service and (b) to 3-day service.

RESPONSE:

(a)-(b) The response to DFC/USPS-5 was based on data from ODIS and PETE, which do not include O/D pairs with a military or overseas origin or destination. For FY 2002, FY 2003, and FY 2004, the only 3-digit zip code pairs where any of the service standard changes enumerated in this question occurred involved at least one military or oversees 3-digit zip code. Therefore, the answer to all of the subparts of this question, as posed, is zero.

For your information, there were a total of 276 service standard changes involving at least one military or oversees 3-digit zip code over those three fiscal years. It is not possible to break them down by year. For a total of 135 pairs, the service standard changed from 2 days to 1 day. For a total of 33 pairs, the service standard changed from 2 days to 3 days. For a total of 108 pairs, the service standard changed from 1 day to 2 days.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-140. Please provide by ZIP (encoded), by route, by date, for all ZIPs for which any data were collected for the CCSTS, the following information. The OCA will accept data from any source and in any medium.

a. The number of delivery points by route section by mode (Foot, NDCBU, etc.)
b. The number of sequenced mailings
c. The number of sequenced mailings with detached address labels
d. Number of carriers who delivered mail on a route
e. Volume by shape for each carrier who delivered mail on a route
f. Overtime street hours (actual or projected)
g. Routes without an assigned carrier
h. Volume in bulk deliveries by shape
i. Carrier Type (*e.g.*, REG, PTF, T-6, etc.) for each carrier who delivered mail on a route

RESPONSE:

a-c, e-i. The information requested is not available.

d. Attached electronically is an Excel file showing date, encrypted ZIP Code, route number, and the number of carriers who scanned for that route on that date. In instances where the route number was missing (indicated by '00' in the route number field) multiple times in a ZIP/day, it was not possible to distinguish between multiple carriers on a single route, or single carriers on multiple routes, and therefore such observations have been excluded.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-141. Is DOIS a database (as witness Stevens states at page 23, line 5 of his testimony)? If not, what is it? If so, in what language and format is it written and stored, and what time period does it cover?

Response

DOIS is a Business Solution System that consists of a number of different applications including a database. Each application has different software. The software includes Visual Basic, COBOL, and DBII. The DOIS database only holds thirteen months of operating data.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-142. Is DOIS "linked" to other databases (*see* USPS-T-15, page 23, line 7)? If not, please explain. If so, please list and describe all databases to which DOIS is linked.

Response

The DOIS system receives data from the Address Management System (AMS), the Time and Attendance Control System (TACS), End of Run (EOR) reports, and the National Budget System (NBS). The DOIS system provides data to the Delivery Performance Achievement Recognition System (DPARS), the Carrier Optimized Routing (COR) system, the Executive Information System (WEBEIS), and the FLASH system. In addition, the Postal Service archives DOIS data.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-144. This interrogatory concerns the Address Management System (AMS).

a. Please list and describe the data fields maintained in or accessible by AMS.
b. Please describe the algorithm or procedure by which AMS classifies routes as Business Foot, Residential Park and Loop, etc.
c. Please describe the procedures and protocols that allow data from individual delivery units or offices to be transmitted to AMS.
d. Witness Kelley has stated that he "obtain[ed] total possible delivery points by delivery mode from the FY 2004 Address Management System (AMS)."[1] Does "delivery mode" refer to an entire route or to route sections?
e. Please provide a copy of instructions followed by delivery supervisors when uploading data to AMS or inputting data that will be accessed by AMS.

Response

A. AMS maintains information on five basic types of entities: ZIP Codes, facilities, routes, address ranges, and individual addresses. ZIP Code information includes the ZIP Code, type of ZIP Code (unique, PO Box, military, or delivery), final sortation method, associated city/place names, Congressional District, and county. Facility information includes facility name, type, phone numbers, addresses, level, and status indicators. Route information includes route type, route number, delivery mode, casing method, status (phantom, auxiliary), and the facility in which the route is housed. Address range information includes the street name elements, address range high and low, route, Congressional District, county, municipality, last line of address (if different from the ZIP Code), and ZIP+4 Code. Individual address information includes address elements, delivery type, delivery status, residential/business indicator, route, delivery sequence, and ZIP+4 Code.

[1] Response of Postal Service Witness John Kelley to Interrogatory VP/USPS-T16-10(i) Posed by Valpak Dealer's Association, Inc., June 3, 2005.

B. AMS includes a "delivery mode" indicator for each route in the system. This indicator is set based on the method used to deliver to the majority of the addresses on the route. AMS does not classify routes as business or residential as part of this delivery mode indicator, nor does it classify routes as business or residential in any other way.

C. There are two methods used to transfer information from a delivery unit to AMS. First is the edit book, which is a binder containing the printout of the delivery addresses for a route, the edit sheet, listed in the order of delivery. Carriers note changes on the edit sheet, which is then sent to the AMS office for input. The second method is the Electronic Edit Sheet (EES), which is part of an application called EES/WinSSI. This is a program created by USPS Engineering which allows a delivery unit to make changes to their DPS sortplan, also capturing those changes and transmitting them electronically to the AMS office. These transmissions are received throughout the day and processed overnight, available to the AMS office the next day. The AMS personnel review the submitted changes and either edit, reject, or accept the changes into the database.

D. Delivery mode in AMS refers to the entire route.

E. Attached to this response electronically are the standard training package for edit book maintenance, and the users guide for EES/WinSSI.

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY FROM THE OFFICE OF CONSUMER ADVOCATE

OCA/USPS-145. Please refer to the response to interrogatory OCA/USPS-46 on June 2, 2005.
a. Confirm that this is the only pilot test of a potential domestic postal retail service that has been undertaken since March 7, 2002.
b. If the statement is not confirmed, then please list all other pilot tests and provide the details requested in interrogatory 46.

RESPONSE:

It is noted that neither this interrogatory nor its precursor (OCA/USPS-46) provide a definition for "retail," which according to the dictionary is "the sale of small quantities to the ultimate consumers." Webster's Ninth New Collegiate Dictionary Ed. 1984. If viewed in the context of this definition, the OCA's use of word "retail" is confusing. The original interrogatory requested a "list of every pilot test of a potential domestic postal retail service currently being offered . . . to one or more potential customers. . . . " It is hard to imagine a retail service or product that the Postal Service would ever develop to sell to a single customer.

Moreover, as technology and the Postal Service change, the possible interpretations to the term "retail" services is likely to change as well. Some may interpret the term according to its more traditional definition as services the Postal Service sells in its retail space, typically the lobby of post offices. Others may interpret in a more modern manner to include sales through any channel. "Retail" could be defined by the type of customer or by the type of product. Clearly, the Postal Service has not used an overly restrictive interpretation of the term "retail services" when responded to Interrogatory OCA/USPS-46 by

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY FROM THE OFFICE OF CONSUMER ADVOCATE

Response to OCA/USPS-T-145 continued:

identifying Friend to Friend as a potential retail service, since that is not a product sold "over

-the-counter." Nor does the Postal Service use a restrictive interpretation as it responds to the interrogatory below. Still, there is a wide room for interpretation of what the OCA means by "potential domestic postal retail services."

a. Not confirmed.

b. One other pilot test has been identified: MicroPayments.

--The USPS MicroPayment test was performed to determine if the use of postage stamps affixed to reply cards, as a payment method for low cost items, would be a feasible response mechanism for businesses to use.

--It was not based upon a strategic alliance between the Postal Service and one or more parties.

--There were six participants. Three were non-profit organizations, one was a concert promoter, one was a coin reseller and one was a consumer product sampling company

--The pilot test was a national offering.

--The only screening criterion used was the company's willingness to meet mailpiece and legal criteria for the program.

--No mailers were denied participation. One participant was required to discontinue participation after refusing to meet legal (copyright) requirements.

--There was no significant effect on any classes, products or services.

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY FROM THE OFFICE OF CONSUMER ADVOCATE

Response to OCA/USPS-T-145 continued:

--The test was initiated in March 2000 and was cancelled in July 2004 for lack of postal support.

--The primary intended users of this service were businesses who wanted to reach their customers through an innovative response mechanism. Specifically, businesses that wanted to acquire new customer information through a low cost (or potentially revenue generating) response mechanism.

--The Postal Service collected information from potential business customers through the sales force and signed them to a user agreement. USPS assisted in designing and approving mailpiece design. USPS provided and then processed a refund form for customers at the local Post Office when mailpieces were returned. Then a refund was issued for unused postage. Postage was refunded at 90% of face value pursuant to the DMM.

--The annual, accrued direct and indirect costs, separately identified, to conduct the pilot test, including, but not limited to, development costs, start-up costs, capital costs, common and joint costs, are as follows:

Testing and Improvement of Image Lift Recognition.

Total: $1,490,000.

FY01, $235,000; FY02, $415,000; FY03, $420,000;

FY04, $420,000.

Purchase Equipment to Test System.

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY FROM THE OFFICE OF CONSUMER ADVOCATE

Response to OCA/USPS-T-145 continued:

Total: $194,000.

FY03, $194,000.

Market Research to Measure Customer Satisfaction, Demand, Requirements.

Total: $50,000.

FY03, $50,000.

Grand Total: $1,734,000

--The total test revenue was $377,000.

--The total test volume was 206,000 pieces.

--There are no annual net income (loss) figures available.

-- There is no precise citation in the current filing for every figure listed above.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-146. Please refer to Attachment Two to interrogatory OCA/USPS-53.

a. Confirm that the following services discussed in the Attachment are provided to the public by the Postal Service on behalf of another federal agency: Migratory Bird Stamps; Passport Applications; and Selective Service. If this is not confirmed, then provide a full explanation.

b. Confirm that the following services are retailed to the public for the purpose of generating additional revenues for the Postal Service: Phone Cards; Readypost; Retail; Meter Manufacturers Marketing Program; Colloborative [sic] Logistics; Magazine Subscriptions; Electronic Payment; Electronic Postmark (EPM); Mailing Online; NetPost Certified Mail; and NetPost Card Store. If this is not confirmed, then provide a full explanation.

RESPONSE:

a. Confirmed.

b. As noted in response to OCA/USPS-145, the Postal Service is unclear on the intended meaning of the term "retail" in the context of this set of questions. Some of these programs (Electronic Payment, NetPost Certified Mail) are no longer offered under any definition. Collaborative Logistics, as described in Attachment Two to OCA/USPS-53, is one example of a service that does not conform with most notions of a "retail" service. Meter Manufacturers Marketing Program, as also described in Attachment Two, provides information to postal customers at retail locations, but the Postal Service receives payment not from those customers, but from the company whose products are being promoted. In general, however, it can be confirmed that one of the purposes of providing those services listed above (that are still being offered) is to generate revenues from products and services which support the mailing needs of our customers or provide convenient access to products relevant to postal customers.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-147. Please refer to the "Affiliates and Alliances" paragraph of Attachment Two to OCA/USPS-53.

a. Please furnish copies of the 75 linking agreements referred to in the interrogatory. (One of the major purposes for this request is to gain a better understanding of the activities performed by the parties to the agreement, particularly the Postal Service, so as to see whether expenses incurred by the Postal Service in performing its activities have been fully and appropriately accounted for). For each, please indicate whether the purpose of the agreement is: (1) to complement the Postal Service's core product offering; (2) to generate mail; and/or (3) to provide value to our customers.

b. With respect to the objective to "provide value to our customers," please confirm that the Postal Service enters into such agreements even if they are not related to postal core products and services and are not intended to generate mail, i.e., an agreement may be forged even if mail and postal core products and services are not involved.
   i. If this is not confirmed, then explain in full.
   ii. Please confirm that the concept of "provid[ing] value to . . . customers" may involve retail activities having nothing to do with mail or core services, e.g., sales of phone cards. If this is not confirmed, then please explain.

c. In instances where core products and mail are not involved, who are the customers meant by "our customers?"
   i. Are they mailers? (Please answer "yes" or "no" and explain the answer.)
   ii. Are they mail recipients? (Please answer "yes" or "no" and explain the answer.)
   iii. The general public outside of their capacity as mailers or mail recipients? (Please answer "yes" or "no" and explain the answer.)
   iv. Another target group? (Please answer "yes" or "no" and explain the answer.)

   d. Please provide copies of the following agreements (if not otherwise provided in response to part a.): Mailing Online; NetPost Certified Mail; and NetPost Card Store.

RESPONSE:

a. Objection filed.

b. i. Confirmed that this may occur.

   ii. Confirmed that this may occur. With respect to the specific example of Phone Cards, however, it may be an overstatement to claim that the sale of

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OCA**

Phone Cards has "nothing to do with mail or core services." For example, it is not unreasonable to expect that some Phone Card customers come to the post office to mail a card or a present, and purchase a Phone Card to include with the mailed item as an additional gift to the recipient. The ability of such customers to enhance what they are sending in this fashion makes using the Postal Service a more attractive option for them.

c. i. Yes, mailers are among the postal customers who view the Postal Service as a quality provider of the product or service rendered.

ii. Yes, mail recipients are among the postal customers who view the Postal Service as a quality provider of the product or service rendered.

iii. Yes, members of the general public are among the postal customers who view the Postal Service as a quality provider of the product or service rendered.

iv. It is not possible to answer this question yes or no. While there may be other target groups for specific programs, it is difficult to state that such groups would not be members of the general public as well.

d. Objection filed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-148. Please refer to the "Affiliates and Alliances" paragraph of Attachment Two to OCA/USPS-53 where it is stated: "Today, we limit consideration of Affiliates to those that complement our core product offering, generate mail, and/or provide value to our customers." Also refer to the Electronic Postmark (EPM) paragraph.

a. Please provide a copy of the Authentidate agreement cited in the EPM paragraph.
b. Is EPM offered to the public by the Postal Service:
   i. to complement the Postal Service's core product offering? (Please answer "yes" or "no" and explain how this purpose is achieved by the agreement.)
   ii. to generate mail? (Please answer "yes" or "no" and explain how this purpose is achieved by the agreement.)
   iii. to provide value to our customers? (Please answer "yes" or "no" and explain how this purpose is achieved by the agreement.)

RESPONSE:

a. Objection filed.

b. i. Yes. The USPS EPM complements the core product by reinforcing the behavior of postal customers to rely upon the Postal Service when they need to conduct business. Whether the customer needs to use hardcopy or electronic means, they have a common infrastructure to protect their documents.

ii. No. EPM usage is not expected to generate additional traditional mail volume. EPM does provide the Postal Service an opportunity to get additional revenue from customers who value the trust and security of the Postal Service and are likely to use electronic forms of business transactions and communications.

iii. Yes. The intent in providing this service is to provide value to customers by providing a way to time and date stamp electronic files securely.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-149. Please refer to Attachment One to OCA/USPS-53.

a. Please confirm that Electronic Postmark (EPM) has had losses every year since inception. If this is not confirmed, then please explain.
b. Please confirm that EPM's revenues have declined every year since inception. If this is not confirmed, then please explain.
c. In view of EPM's unfavorable financial impact on the Postal Service, does the Postal Service have plans to terminate this program? If so, when will it be terminated? If not, why not?
d. What will EPM's status be in the test year, i.e., will it be an ongoing program? Please explain.

RESPONSE:

a. Confirmed.

b. Not confirmed. EPM revenues declined from FY2001 to FY2004. During the first six-months of FY 2005, however, revenues have already surpassed FY2004 and FY2003 levels.

c. The Postal Service has an existing contract in place with Authentidate for a term which runs through July 31, 2007. The Postal Service plans to abide by the terms of this contract. At this point, no decision has been made to terminate the contract prior to July 31, 2007.

d. No decisions have made concerning the next steps beyond the existing agreement in place, which runs through the test year and ends July 31, 2007.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-150. With respect to NetPost Mailing Online, as provided by PosteDigital.

a. Please confirm that Lee Garvey is an officer and/or owner of PosteDigital. If this is not confirmed, then please explain.

b. Please confirm that Lee Garvey had a key role in the development of Mailing Online and was, in fact: "responsible for managing the development of Mailing Online." USPS-T-1 at page iv, Docket No. MC98-1. If this is not confirmed, then please explain.

c. Please explain whether, and how, the current Mailing Online offering (with PosteDigital) compensates domestic postal ratepayers for their expenditures on the start-up costs for Mailing Online as detailed in Docket No. MC2000-2. Provide spreadsheets, calculations, and source documents used to answer this question.

d. Please explain whether, and how, the current Mailing Online offering (with PosteDigital) compensates domestic postal ratepayers for the losses produced by Mailing Online as detailed in the 6 reports filed with the Commission Docket No. MC2000-2, from May 11, 2001, through July 11, 2003 . Provide spreadsheets, calculations, and source documents used to answer this question.

RESPONSE:

a. Confirmed.

b. Confirmed that Lee Garvey was responsible for managing the development of MOL throughout Docket No. MC98-1, but not Docket No. MC2000-2.

c. To the extent that the current Mailing Online offering generated more revenue than expenses in FY04, and continues to do so going forward, it reduces the contribution required from all other postal customers to allow the Postal Service to achieve its breakeven objective. In the alternative, in the absence of the current Mailing Online offering and any net revenue it can generate, all other postal customers would need to generate greater contribution to allow the Postal Service to achieve its breakeven objective. The more germane issue for

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

domestic postal ratepayers, therefore, is whether they are better off with or without the current Mailing Online offering, and not whether the current Mailing Online offering can "compensate" for the start-up expenditures associated with previous incarnations of Mailing Online. Furthermore, there is no established basis for the implicit assumption in this question that domestic postal ratepayers were the source of funds for expenditures on the start-up costs of previous incarnations of Mailing Online, as opposed to, for example, international ratepayers, or customers of nonpostal services.

d. To the extent that the current Mailing Online offering generated more revenue than expenses in FY04, and continues to do so going forward, it reduces the contribution required from all other postal customers to allow the Postal Service to achieve its breakeven objective. In the alternative, in the absence of the current Mailing Online offering and any net revenue it can generate, all other postal customers would need to generate greater contribution to allow the Postal Service to achieve its breakeven objective. The more germane issue for domestic postal ratepayers, therefore, is whether they are better off with or without the current Mailing Online offering, and not whether the current Mailing Online offering can "compensate" for the losses associated with previous incarnations of Mailing Online.

Nonetheless, it may bear mention that the losses referred to in this question were incurred by Mailing Online when it was contemplated and offered as an experimental domestic postal service (albeit a hybrid one). Specifically, the Postal Service intended to offer it as an alternative channel for mailers to

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-150, Continued

submit mailings. Domestic postal ratepayers potentially stood to benefit from MOL in three ways. First, some customers could actually find it more convenient and/or economical to enter their mail through this channel, and would thus become MOL customers in order to better satisfy their existing demand for postal services. Even for those mailers who did not enter their mail through this channel, if MOL could generate additional contribution, the institutional cost burden for all postal customers would be reduced. Additional contribution could come from two sources. Some customers (new or existing) could find the features of MOL so attractive that they could begin to generate new mail that would not have existed but for MOL. Additional contribution would be expected from the postage charged to such new volume. Lastly, it was anticipated that new contribution could be obtained from the fees being charged for the MOL service itself. Hoping to benefit postal customers by offering better service, by generating additional contribution from new volume, and by generating additional contribution from MOL fees, the Postal Service proposed this experiment to the Commission, litigated the proposal, and implemented the Commission's recommendation.

The experiment was not a success if success is defined as making a positive contribution. The level of demand necessary to fulfill the business plan did not materialize. However, the experiment was a success in that it informed management's judgment regarding the role best played by the Postal Service in the provision of a hybrid mailing option to customers.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-150, Continued

In any event, experiments such as Mailing Online entail the risk that sometimes (in fact, many times) losses are incurred. This was such an occasion. It is not dissimilar to an instance in which the Postal Service invests time and money into a potential variety of mail processing equipment, only to discover that the technology does not yet exist to produce a feasible piece of equipment. Under the fundamental breakeven structure of the Postal Service, those types of costs are ultimately borne by the Postal Service's customers (domestic, international, and nonpostal). To the extent that domestic postal ratepayers stood to benefit financially, whether directly and/or indirectly from a successful MOL experiment, it is not unreasonable that they might be called upon to bear some portion of the losses from a financially unsuccessful experiment.

What ultimately appears to be most critically absent from this question is an awareness that any attempt to apply new technology to improve domestic postal services involves a risk that costs will exceed benefits, and "losses" will be incurred. The Postal Reorganization Act was written to grant the management of the Postal Service the flexibility to undertake such risks, however, despite the sure knowledge that in some instances mailers would be called upon to bear the burden of planning decisions regarding postal services not sustained by later eventualities. It is important to recall that, despite the fact that the Postal Service now treats the ongoing revenues and expenses relating to the current MOL arrangement as it treats revenues and expenses relating to nonpostal services, by no means did MOL start out as a nonpostal service.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-150, Continued

Once it was determined not to go forward with MOL along the lines contemplated under the original business plan litigated at the Commission, it was necessary to address the possibility of salvaging anything from the experiment. If there were a fair possibility of obtaining some positive net revenue stream going forward, it would not be reasonable to forgo such opportunities merely because they might be unlikely to generate sufficient net revenue to recover past losses over a short time horizon. The current arrangement regarding MOL was selected in preference to simply shutting down the service completely and abandoning any prospects for future earnings of any magnitude. And as shown in Attachment One to the response to OCA/USPS-53, MOL did generate nonpostal revenues in excess of costs in FY04.

Moreover, unlike some other nonpostal services, MOL creates benefits beyond those reflected in the net of MOL direct expenses and revenues. As noted above in the discussion of the product as originally conceived, if MOL causes the creation of mail volume that would not have existed otherwise, there is additional contribution obtained from the postage for such pieces. That contribution is not included in the Postal Service's aggregate figures for nonpostal services, because it is already included as contribution from postal services. It is, of course, difficult to identify which pieces in the MOL-related programs would not have been mailed if such programs did not exist, but an estimate of 38 percent was accepted by the Commission in Docket Nos. MC98-1 and MC2000-2. Postage from mail pieces tendered through MOL in FY04 was $5.2 million, the vast majority of which was First-Class Mail, with its relatively

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-157. With respect to claims pursuant to Postal Insurance, please provide the following:

a. Average length of time to inform the claimant that a claim has been received
b. Average length of time to inform the claimant that a claim will be paid
c. Average length of time to inform the claimant that a claim is denied
d. Average length of time to inform the claimant that an appeal has resulted in a decision to pay the claim
e. Average length of time to inform the claimant that an appeal upholds the prior decision
f. Please provide the full range of days for each of the average time figures requested in parts a. – e., e.g., the number of claims that were paid 1 day following the submission of the claim, the number of claims that were paid 2 days following the submission of the claim . . . until the number of days for the longest time period is set forth.
g. Also provide any internal time standards that the Postal Service applies to its employees for each of the steps listed in parts a. – e. of this question.
h. Supply the information requested above (both in the predicate and parts a. – g.) for Registered Mail.
i. Supply the information requested above (both in the predicate and parts a. – g.) for Express Mail, with insurance included.
j. Supply the information requested above (both in the predicate and parts a. – g.) for Express Mail, with supplemental insurance.

RESPONSE:

a. The claimant is not informed that a claim has been received.

b-e.

Average Number of Days Until an Action is Taken

	b.	c.	d. First Appeal	d. Second Appeal	e. First Appeal	e. Second Appeal
Numbered Insurance	11.3	16.6	6.9	14.5	9.2	13.9
Registered Mail	28.3	21.6	4.0	10.3	2.4	7.2
Express Mail with insurance	10.1	18.2	5.7	5.3	5.0	13.2
Express Mail with supplemental insurance	22.9	18.6	5.5	5.4	1.4	5.4

f. The following tables provides the full range of days for each of the average time figures requested in parts a. – e. with those days with zero in each cell omitted.

g. 15 days for Adjudication, 60 days for claims Appeals, 30 days for Registered Adjudication.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Numbered Insurance

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
0	38259	7383	352	1991	54	55
1	21011	6322	138	448	0	4
2	4457	1439	28	84	0	0
3	4132	1203	57	114	0	2
4	3034	909	9	69	0	1
5	2457	865	32	49	2	0
6	1233	348	13	46	2	3
7	1019	237	25	57	0	0
8	432	85	19	67	0	3
9	608	228	8	26	1	0
10	339	61	13	42	1	0
11	317	108	9	32	0	0
12	896	285	9	37	1	2
13	468	92	6	33	1	0
14	510	115	12	38	0	2
15	452	83	11	43	1	3
16	260	72	5	27	3	4
17	446	83	2	20	6	3
18	436	57	5	17	0	0
19	430	158	3	14	0	2
20	866	146	5	20	1	1
21	643	115	11	51	3	4
22	616	97	7	55	5	9
23	321	85	5	14	4	1
24	445	95	3	15	1	3
25	528	88	3	23	9	4
26	441	117	5	19	2	0
27	409	83	18	34	5	1
28	603	165	3	32	1	1
29	427	132	5	18	1	0
30	418	1167	2	5	0	0
31	749	785	3	22	2	0
32	422	915	3	3	1	0
33	389	1308	5	27	0	0
34	638	235	4	27	1	0
35	963	292	4	24	0	3
36	492	130	9	15	1	0
37	274	89	4	14	0	0
38	394	92	5	4	1	1
39	389	203	7	20	0	0
40	286	87	2	11	0	1
41	614	114	3	14	0	0
42	405	165	6	22	0	0
43	349	73	4	7	0	0
44	197	63	1	1	0	0
45	237	68	2	1	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
46	445	160	1	5	0	0
47	201	96	1	2	0	0
48	568	140	0	2	1	1
49	342	105	1	7	0	0
50	211	34	2	2	0	0
51	146	42	1	2	0	1
52	263	122	1	6	0	1
53	403	52	1	3	0	0
54	150	51	1	5	1	0
55	167	72	2	4	0	0
56	217	72	0	4	1	1
57	187	84	2	3	0	0
58	122	70	2	0	1	0
59	97	42	1	0	0	0
60	82	22	0	1	0	0
61	114	96	2	0	0	0
62	146	62	0	2	0	0
63	134	35	0	3	1	1
64	90	41	0	0	0	0
65	96	104	1	0	0	0
66	76	23	0	1	0	1
67	91	47	1	0	0	0
68	127	92	0	0	0	0
69	115	50	2	1	0	0
70	106	45	0	3	0	0
71	79	21	0	1	0	0
72	66	10	0	0	0	0
73	38	15	0	0	0	0
74	56	43	1	0	0	0
75	45	36	2	1	0	0
76	62	24	5	0	0	1
77	109	87	1	0	0	1
78	98	31	0	0	0	0
79	47	16	0	0	0	0
80	67	16	0	0	0	0
81	29	9	0	1	0	0
82	51	80	0	0	0	0
83	75	55	0	0	0	0
84	92	43	0	0	0	0
85	60	23	1	0	0	0
86	44	15	0	0	0	0
87	74	11	0	0	0	1
88	32	3	0	2	0	0
89	51	12	0	0	0	0
90	151	253	0	1	0	2
91	167	122	0	0	0	0
92	78	27	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
93	33	43	0	0	0	0
94	16	20	0	0	0	0
95	18	8	0	1	0	0
96	63	16	1	1	0	0
97	37	9	0	0	0	0
98	36	20	0	1	0	0
99	49	15	0	0	0	0
100	50	22	0	0	0	0
101	34	17	0	0	0	0
102	15	6	1	0	0	0
103	21	4	0	0	0	0
104	34	10	0	0	0	0
105	25	14	0	0	0	0
106	30	8	0	0	0	0
107	13	3	0	0	0	0
108	31	4	0	0	0	0
109	17	7	0	0	0	0
110	14	3	0	1	0	0
111	28	6	0	0	0	0
112	15	1	0	0	0	0
113	14	5	0	0	0	0
114	41	4	0	1	0	0
115	17	5	1	0	0	0
116	10	1	0	0	0	0
117	18	5	0	1	0	0
118	22	4	0	0	0	0
119	17	8	0	0	0	0
120	17	1	0	0	0	0
121	14	1	0	0	0	0
122	16	4	0	0	0	0
123	9	0	0	0	0	0
124	32	3	0	0	1	0
125	13	7	0	1	0	0
126	20	3	0	0	0	0
127	13	1	0	0	0	0
128	9	3	0	0	0	0
129	14	4	0	0	0	0
130	5	4	0	0	0	0
131	5	6	0	0	0	0
132	15	3	0	0	0	0
133	20	3	0	0	0	0
134	10	2	0	0	0	0
135	12	4	0	0	0	0
136	10	1	0	0	0	0
137	7	3	0	0	0	0
138	9	1	0	1	0	0
139	8	2	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
140	10	3	0	0	0	0
141	8	2	0	0	0	0
142	9	0	0	0	0	0
143	5	1	0	0	0	0
144	5	4	0	0	0	0
145	7	2	0	0	0	0
146	15	1	0	0	0	0
147	17	6	0	0	0	0
148	16	1	0	0	0	0
149	10	1	0	0	0	0
150	3	3	0	0	0	0
151	13	0	0	0	0	0
152	21	1	0	0	0	0
153	13	2	0	0	0	0
154	16	4	0	0	0	0
155	9	2	0	0	0	0
156	8	0	1	0	0	0
157	24	3	0	0	0	0
158	16	2	0	0	0	0
159	14	2	0	0	0	0
160	12	3	0	0	0	0
161	13	3	0	0	0	0
162	1	0	0	0	0	0
163	9	3	0	0	0	0
164	10	2	0	0	0	0
165	4	1	0	0	0	0
166	19	1	0	0	0	0
167	7	1	0	0	0	0
168	8	3	0	0	0	0
169	2	0	0	0	0	0
170	7	9	0	0	0	0
171	4	1	0	0	0	0
172	3	0	0	0	0	0
173	16	9	0	0	0	0
174	9	0	0	0	0	0
175	8	1	0	0	0	0
176	7	0	0	0	0	0
177	4	0	0	0	0	0
178	0	1	0	0	0	0
179	5	2	0	0	0	0
180	2	1	0	0	0	0
181	8	5	0	0	0	0
182	8	1	0	0	0	0
183	3	0	0	0	0	0
184	2	0	0	0	0	0
185	3	1	0	0	0	0
186	3	0	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
187	3	1	0	0	0	0
188	1	0	0	0	0	0
189	4	3	0	0	0	0
190	6	0	0	0	0	0
191	3	0	0	0	0	0
192	1	0	0	0	0	0
193	1	2	0	0	0	0
194	6	9	0	0	0	0
195	4	3	0	0	0	0
196	2	0	0	0	0	0
197	6	0	0	0	0	0
198	5	0	0	0	0	0
199	0	1	0	0	0	0
200	2	0	0	0	0	0
201	3	15	0	0	0	0
202	8	2	0	0	0	0
203	4	0	0	0	0	0
204	2	1	0	0	0	0
205	1	3	0	0	0	0
207	2	0	0	0	0	0
208	1	0	0	0	0	0
209	2	0	0	0	0	0
210	3	0	0	0	0	0
211	3	0	0	0	0	0
212	1	0	0	0	0	0
213	3	2	0	0	0	0
215	2	0	0	0	0	0
216	2	1	0	0	0	0
217	2	0	0	0	0	0
218	1	0	0	0	0	0
219	1	0	0	0	0	0
221	2	0	0	0	0	0
222	2	0	0	0	0	0
223	7	0	0	0	0	0
224	1	0	0	0	0	0
225	2	0	0	0	0	0
226	1	0	0	0	0	0
228	3	1	0	0	0	0
229	1	1	0	0	0	0
231	1	0	0	0	0	0
233	1	0	0	0	0	0
234	1	0	0	0	0	0
235	1	0	0	0	0	0
236	0	1	0	0	0	0
238	2	0	0	0	0	0
239	1	0	0	0	0	0
240	0	1	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
251	1	1	0	0	0	0
253	3	0	0	0	0	0
254	1	0	0	0	0	0
255	1	0	0	0	0	0
256	2	0	0	0	0	0
257	1	0	0	0	0	0
258	2	0	0	0	0	0
259	1	0	0	0	0	0
261	0	1	0	0	0	0
266	1	0	0	0	0	0
271	1	0	0	0	0	0
275	0	1	0	0	0	0
276	2	0	0	0	0	0
278	0	1	0	0	0	0
279	1	0	0	0	0	0
282	1	0	0	0	0	0
286	2	0	0	0	0	0
292	1	0	0	0	0	0
293	1	0	0	0	0	0
294	1	0	0	0	0	0
295	2	0	0	0	0	0
304	1	0	0	0	0	0
312	0	1	0	0	0	0
314	3	0	0	0	0	0
315	3	0	0	0	0	0
320	2	0	0	0	0	0
323	1	0	0	0	0	0
324	1	0	0	0	0	0
330	1	0	0	0	0	0
332	1	0	0	0	0	0
333	1	0	0	0	0	0
334	1	0	0	0	0	0
336	1	0	0	0	0	0
340	1	0	0	0	0	0
343	2	0	0	0	0	0
344	1	0	0	0	0	0
352	1	0	0	0	0	0
355	1	0	0	0	0	0
361	1	0	0	0	0	0
365	1	0	0	0	0	0
384	1	0	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Registered Mail

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
0	62	68	49	41	6	4
1	15	69	1	1	0	0
2	21	13	1	0	0	0
3	10	17	0	0	0	0
4	7	9	0	0	0	0
5	14	2	0	1	0	0
6	17	9	0	0	0	0
7	10	1	0	0	0	0
8	3	3	0	0	0	0
9	14	4	0	0	0	0
10	6	5	0	0	0	0
11	8	4	0	0	0	0
12	7	3	0	0	0	0
13	5	4	0	0	1	0
14	19	4	0	0	0	1
15	12	1	0	0	1	0
16	3	3	0	0	0	0
17	6	4	0	0	0	0
18	12	5	0	0	0	0
19	5	4	0	0	0	0
20	12	6	0	0	0	0
21	21	4	0	1	0	1
22	12	4	0	0	2	1
23	8	2	0	0	0	0
24	18	3	0	0	0	0
25	2	2	0	0	0	1
26	3	2	0	1	0	0
27	8	1	0	0	0	0
28	8	3	0	0	0	0
29	8	3	0	0	0	0
30	2	11	0	0	0	0
31	8	15	0	0	0	0
32	8	13	0	0	0	0
33	15	10	0	0	0	0
34	7	3	0	0	0	0
35	11	9	0	0	0	0
36	10	1	0	0	0	0
37	5	4	0	0	0	0
38	6	2	0	0	0	0
39	20	9	0	0	0	0
40	6	4	0	0	0	0
41	3	13	0	0	0	0
42	6	8	0	0	0	0
43	6	2	0	0	0	0
44	4	0	0	0	0	0
45	2	2	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
46	1	0	0	0	0	0
47	4	3	0	0	0	0
48	6	3	0	1	0	0
49	3	1	0	0	0	0
50	3	2	0	0	0	0
52	2	6	0	0	0	0
53	2	2	0	0	0	0
54	3	0	0	0	0	0
55	2	1	0	0	0	0
56	2	3	0	0	0	0
57	3	1	1	0	0	0
58	2	1	0	0	0	0
59	1	1	0	0	0	0
60	4	2	0	0	0	0
61	0	3	0	0	0	0
62	2	0	0	0	0	0
63	1	1	0	0	0	0
64	1	1	0	0	0	0
65	0	2	0	0	0	0
66	1	0	0	0	0	0
67	3	0	1	0	0	0
68	1	0	0	0	0	0
69	0	2	0	0	0	0
70	6	0	0	0	0	0
72	4	0	0	0	0	0
73	1	0	0	0	0	0
75	3	3	0	0	0	0
77	2	1	0	0	0	0
79	1	0	0	0	0	0
80	0	1	0	0	0	0
81	0	1	0	0	0	0
82	2	1	0	0	0	0
85	1	0	0	0	0	0
86	1	0	0	0	0	0
87	1	0	0	0	0	0
88	1	0	0	1	0	0
90	0	1	0	0	0	0
91	1	1	0	0	0	0
92	2	0	0	0	0	0
94	1	0	0	0	0	0
95	1	0	0	0	0	0
99	1	1	0	0	0	0
100	2	0	0	0	0	0
101	1	0	0	0	0	0
104	1	1	0	0	0	0
105	1	0	0	0	0	0
106	3	1	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
107	1	0	0	0	0	0
109	1	0	0	0	0	0
110	2	0	0	0	0	0
115	1	0	0	0	0	0
120	2	0	0	0	0	0
122	0	1	0	0	0	0
126	1	0	0	0	0	0
134	0	1	0	0	0	0
135	1	0	0	0	0	0
137	0	1	0	0	0	0
142	1	0	0	0	0	0
148	1	0	0	0	0	0
168	1	0	0	0	0	0
170	1	0	0	0	0	0
179	0	1	0	0	0	0
183	1	0	0	0	0	0
193	0	1	0	0	0	0
221	1	0	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Express Mail with Insurance

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
0	942	346	65	98	4	4
1	435	186	3	1	0	0
2	72	47	0	4	0	0
3	71	45	1	0	0	0
4	42	21	1	1	0	0
5	27	4	0	0	0	0
6	19	4	1	0	1	0
7	18	12	0	0	0	0
8	16	5	1	0	0	1
9	9	3	0	0	0	0
10	4	0	0	0	0	0
11	6	5	0	2	0	0
12	15	10	1	0	0	0
13	9	1	0	0	0	0
14	3	2	0	0	0	0
15	14	2	1	0	0	0
16	7	1	0	1	0	0
17	7	2	0	1	0	0
18	7	6	0	2	0	0
19	5	4	1	0	0	0
20	16	5	0	1	0	0
21	12	8	1	1	1	0
22	11	4	0	3	0	0
23	8	2	0	0	1	0
24	3	0	1	0	0	1
25	5	1	0	2	1	0
26	6	2	1	1	0	0
27	6	2	1	3	0	0
28	12	6	0	0	1	0
29	6	2	0	0	1	0
30	6	28	0	0	0	0
31	6	36	0	0	0	0
32	8	23	0	0	0	0
33	11	43	0	0	0	0
34	13	16	1	1	0	0
35	13	12	1	2	0	0
36	5	5	1	1	0	0
37	7	6	0	0	0	0
38	9	2	1	1	0	0
39	9	5	0	1	0	0
40	6	2	0	1	0	0
41	6	3	1	0	0	0
42	9	5	0	0	0	0
43	5	3	0	0	0	0
44	8	5	0	0	0	0
45	8	4	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
46	15	4	0	1	0	0
47	3	5	0	0	0	0
48	15	6	0	0	0	0
49	6	11	0	0	0	0
50	8	3	0	0	0	0
51	1	2	0	0	0	0
52	7	3	0	0	0	0
53	5	6	0	0	0	0
54	3	5	0	0	0	0
55	7	5	0	0	0	0
56	5	5	0	0	0	0
57	5	1	0	0	0	0
58	4	5	0	0	0	0
59	1	1	0	0	0	0
60	3	0	0	0	0	0
61	4	14	0	0	0	0
62	0	2	0	0	0	0
63	4	2	0	1	0	0
64	1	2	0	0	0	0
65	0	1	0	0	0	0
66	1	2	0	0	0	0
67	1	0	0	0	0	0
68	11	1	0	0	0	0
69	4	0	0	0	0	0
70	8	1	0	0	0	0
71	2	1	0	0	0	0
72	3	0	0	0	0	0
73	1	1	0	0	0	0
74	1	0	0	0	0	0
75	1	3	1	0	0	0
76	0	1	0	0	0	0
77	3	1	0	0	0	0
78	2	0	0	0	0	0
79	3	0	0	0	0	0
80	1	0	0	0	0	0
83	0	3	0	0	0	0
84	1	1	0	0	0	0
86	0	1	0	0	0	0
87	0	1	0	0	0	0
88	0	1	0	0	0	0
89	0	1	0	0	0	0
90	6	26	0	0	0	0
91	1	4	0	0	0	0
93	0	2	0	0	0	0
94	0	1	0	0	0	0
96	1	0	0	0	0	0
98	0	2	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
100	0	2	0	0	0	0
102	0	1	0	0	0	0
105	1	0	0	0	0	0
106	1	2	0	0	0	0
111	1	3	0	0	0	0
112	1	0	0	0	0	0
119	1	1	0	0	0	0
122	1	0	0	0	0	0
130	0	1	0	0	0	0
132	0	1	0	0	0	0
133	3	0	0	0	0	0
143	1	0	0	0	0	0
145	1	1	0	0	0	0
148	1	0	0	0	0	0
150	0	1	0	0	0	0
154	2	0	0	0	0	0
158	1	0	0	0	0	0
159	1	0	0	0	0	0
163	0	1	0	0	0	0
174	1	0	0	0	0	0
187	0	1	0	0	0	0
204	1	0	0	0	0	0
213	0	1	0	0	0	0
216	1	0	0	0	0	0
228	1	0	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Express Mail with Supplemental Insurance

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
0	181	102	37	41	1	7
1	49	42	3	1	0	1
2	18	6	0	1	0	0
3	20	9	0	1	0	1
4	15	6	0	0	0	0
5	9	2	0	0	0	0
6	10	1	0	1	0	1
7	7	1	0	1	0	0
8	6	0	0	3	0	0
9	5	0	1	0	0	0
10	4	1	0	1	0	0
11	6	2	0	0	0	0
12	5	1	0	0	1	0
13	8	2	1	1	0	0
14	6	2	0	0	0	1
15	5	4	0	1	0	0
16	0	3	0	1	0	0
17	3	2	0	0	0	0
18	5	0	0	0	0	0
19	3	1	0	0	0	0
20	3	0	0	0	0	0
21	5	0	0	0	0	0
22	5	0	0	2	0	1
23	5	1	0	0	0	0
24	2	2	0	0	0	1
25	4	0	0	0	1	0
26	7	1	0	0	0	0
27	9	0	0	2	0	0
28	5	0	0	1	0	0
29	6	0	0	0	0	0
30	5	5	0	0	0	0
31	3	8	0	0	0	0
32	0	12	0	0	0	0
33	4	10	0	0	0	0
34	4	3	0	0	0	0
35	8	1	0	1	0	0
36	4	2	1	0	0	0
37	3	1	0	1	0	0
38	10	1	0	0	0	0
39	4	3	0	1	0	0
40	6	1	0	0	0	0
41	3	1	0	0	0	0
42	9	0	0	0	0	0
43	8	0	0	0	0	0
44	4	1	0	0	0	0
45	6	0	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
46	6	1	0	0	0	0
47	4	1	0	0	0	0
48	7	0	0	0	0	0
49	5	1	0	0	0	0
50	1	1	0	0	0	0
51	2	0	0	0	0	0
52	2	1	0	0	0	0
53	1	1	0	0	0	0
54	3	0	0	0	0	0
55	0	1	0	0	0	0
56	4	1	0	0	0	0
57	4	0	0	0	0	0
58	1	0	0	0	0	0
59	2	0	0	0	0	0
60	1	1	0	0	0	0
61	1	3	0	0	0	0
62	3	1	0	0	0	0
63	1	0	0	0	0	0
65	2	0	0	0	0	0
67	1	0	0	0	0	0
68	2	0	0	0	0	0
69	2	0	0	0	0	0
70	1	0	0	0	0	0
71	2	0	0	0	0	0
72	0	1	0	0	0	0
73	1	0	0	0	0	0
74	1	2	0	0	0	0
76	1	0	0	0	0	0
77	2	1	0	0	0	0
78	2	0	0	0	0	0
79	2	1	0	0	0	0
82	0	1	0	0	0	0
83	0	1	0	0	0	0
85	1	0	0	0	0	0
87	1	1	0	0	0	0
88	1	0	0	0	0	0
90	2	2	0	0	0	0
91	1	3	0	0	0	0
92	2	1	0	0	0	0
93	2	0	0	0	0	0
99	1	0	0	0	0	0
100	1	0	0	0	0	0
101	2	0	0	0	0	0
102	0	2	0	0	0	0
103	3	1	0	0	0	0
110	1	0	0	0	0	0
115	0	1	0	0	0	0

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Claim Count by # of Days	*First Status to Payment*	*First Status to Denial*	*First Appeal to Denial*	*First Appeal to Payment*	*Second Appeal to Denial*	*Second Appeal to Payment*
119	1	0	0	0	0	0
125	1	0	0	0	0	0
127	1	0	0	0	0	0
128	1	0	0	0	0	0
132	1	0	0	0	0	0
138	1	0	0	0	0	0
146	1	0	0	0	0	0
152	1	0	0	0	0	0
154	0	1	0	0	0	0
158	0	1	0	0	0	0
159	1	0	0	0	0	0
161	0	1	0	0	0	0
168	1	0	0	0	0	0
172	1	0	0	0	0	0
199	0	1	0	0	0	0
217	1	0	0	0	0	0
229	1	0	0	0	0	0
231	1	0	0	0	0	0
343	1	0	0	0	0	0

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-162. Please refer to the response to OCA/USPS-T10-3, redirected from witness Waterbury.

a. Refer to the table "Registry Volume and Volume Variable Cost." During the period FY 2000 to FY 2004, please confirm that the cost elasticity of Registered Mail is 0.0904 (($81,269,000 / $84,619,000 – 1) / (5,008,595 / 8,319,000 – 1)). If you do not confirm, please explain.

b. Where the cost elasticity of Registered Mail is 0.0904, please confirm that a 10 percent increase (decrease) in Registered Mail volume would cause a 0.904 (0.0904 * 10) percent increase (decrease) in costs. If you do not confirm, please explain.

RESPONSE:

a. Confirmed that the ratio of the percentage change in nominal Registered Mail volume-variable cost (VVC) to the percentage change in Registered mail volume between FY 2000 and FY 2004 is 0.0904. However, the calculation has several limitations. The change in measured costs may not solely reflect the change in volume, holding other things equal (as in the formulation of the elasticity, ∂ ln C/∂ ln V). By using nominal (current dollar) costs, this calculation understates to some extent the degree with which Registered Mail VVC varies with volume, since the BY 2000 costs would be higher in constant BY 2004 dollars. Also, the calculation does not necessarily indicate the degree of volume variability in any specific cost pool or other cost component where Registered Mail costs may be incurred.

b. Confirmed, given a cost elasticity with respect to volume of 0.0904 that is constant over a +/- 10 percent volume change.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-163. Please refer to the response to OCA/USPS-T10-2, redirected from witness Waterbury, where it states in part that "Registered Mail costs are fairly independent of volume." Also, please refer to OCA/USPS-162(a), above.

a. Where the cost elasticity of Registered Mail is 0.0904, please confirm that 9.04 percent of Registered Mail costs vary with volume, and 90.96 percent of such costs do not. If you do not confirm, please explain.

b. Is a cost elasticity of 0.0904 consistent with the claim that "Registered Mail costs are fairly independent of volume?" Please explain.

c. If "Registered Mail costs are fairly independent of volume," why are such costs that are independent of volume treated as volume variable? Please explain.

RESPONSE:

a. Not confirmed. The elasticity of volume-variable cost (VVC) with respect to volume, as in OCA/USPS-162(a) describes how Registered Mail VVC will vary on the margin with respect to changes in volume, as in OCA/USPS-162(b).

b. "Fairly independent of volume" appears to be consistent with the term "inelastic"—i.e., a relationship between VVC and volume with less than unit elasticity. An elasticity of 0.0904 is inelastic.

c. The existence of volume-variable costs only suggests that the cost elasticities with respect to volume are nonzero. Insofar as the response to OCA/USPS-T10-2 did not describe Registered Mail costs as "independent of volume," which might imply zero elasticity, but rather in terms that suggest an inelastic VVC-volume relationship, there is no contradiction.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-164. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Post Office Box service.

a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Post Office Box service fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. If the Postal Service fails to measure the performance of its employees in providing Post Office Box service, then isn't it likely that Post Office Box holders will find that the service provided to them is unsatisfactory a high percentage of the time? Please explain any negative answer.
f. Does the Postal Service have a target time by which mail should be in a Post Office Box holder's box?
   i. If so, what is the time?
   ii If not, why not?
   i. Is the target time a requirement or only a guideline? Please explain.
g. Please provide response to parts a. – c., and f., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

PO Box Up Times are established at each office. The box clerk is supposed to have all box mail placed in all boxes by the Box Up Time.

a. These box up times were first established about 10 years ago.

b. Post office boxes receive EXFC mail. Such mail that is not delivered by the Box Up Time may be treated as delivered the following day for purposes of EXFC performance standards.

c. Box mail is generally up by the PO Box Up Time 98 percent of the time.

d-e. Not applicable

f. Yes.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

i. The Box Up Time varies by office. Generally, the time is between 9:00am and 12:00pm.

ii Not applicable

ii. Meeting the Box Up Time is treated as a requirement.

g. The responses to these parts apply to FY 2001-2005.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-165. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Merchandise Return Service.

a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Merchandise Return service fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. Please provide response to parts a. – c., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

There is no separate standard for Merchandise Return Service. The applicable standard is based on the underlying class of mail.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-166. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Certified Mail.

a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Certified Mail fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. Isn't it true that if the Postal Service fails to establish standards and benchmarks, thereby failing to measure its level of successful performance, then a significant percentage of Certified Mail purchases will result in unsatisfactory service to customers? If this is not confirmed, then please explain.
f. Please provide response to parts a. – c., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

The Postal Service seeks scan performance of 98 percent on Certified Mail. See the response to DFC/USPS-42, filed May 31, 2005.

a. Certified Mail scan performance goals were first established in FY 2003.

b. No internal system was used to establish the goal.

c. Scan performance was at 86 percent in January, 2003, 93 percent in January, 2004, and 93 percent in January, 2005. Also, see the response to DFC/USPS-15 for recent scan performance data.

d-e. Not applicable

f. Data earlier than those in part c are not available.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-167. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Registered Mail.

a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Registered Mail fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. Isn't it true that if the Postal Service fails to establish standards and benchmarks, thereby failing to measure its level of successful performance, then a significant percentage of Registered Mail purchases will result in unsatisfactory service to customers? If this is not confirmed, then please explain.
f. Please provide response to parts a. – c., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

a-c, f. There are no such benchmarks.

d. Standardized benchmarks are hard to establish and apply, since many variables may affect Registered Mail service.

e. Benchmarks are not the only method for getting employees to provide satisfactory customer service. Postal employee performance is routinely reviewed by their local managers. Moreover, establishing benchmarks for each special service would lead to so many benchmarks that their value would diminish, as employees would need to focus on a wide variety of directives, and monitoring of and messaging on benchmark performance would become unduly complicated.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-168. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Return Receipt.

a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Return Receipt fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. Isn't it true that if the Postal Service fails to establish standards and benchmarks, thereby failing to measure its level of successful performance, then a significant percentage of Return Receipt purchases will result in unsatisfactory service to customers? If this is not confirmed, then please explain.
f. Please provide response to parts a. – c., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

a-c, f. There are no such benchmarks.

d. Standardized benchmarks are hard to establish and apply, since many variables may affect return receipt service.

e. Benchmarks are not the only method for getting employees to provide satisfactory customer service. Postal employee performance is routinely reviewed by their local managers. Moreover, establishing benchmarks for each special service would lead to so many benchmarks that their value would diminish, as employees would need to focus on a wide variety of directives, and monitoring of and messaging on benchmark performance would become unduly complicated.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-169. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Return Receipt for Merchandise.

a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Return Receipt for Merchandise fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. Isn't it true that if the Postal Service fails to establish standards and benchmarks, thereby failing to measure its level of successful performance, then a significant percentage of Return Receipt for Merchandise purchases will result in unsatisfactory service to customers? If this is not confirmed, then please explain.
f. Please provide response to parts a. – c., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

a-c, f. There are no such benchmarks.

d. Standardized benchmarks are hard to establish and apply, since many variables may affect return receipt for merchandise service.

e. Benchmarks are not the only method for getting employees to provide satisfactory customer service. Postal employee performance is routinely reviewed by their local managers. Moreover, establishing benchmarks for each special service would lead to so many benchmarks that their value would diminish, as employees would need to focus on a wide variety of directives, and monitoring of and messaging on benchmark performance would become unduly complicated.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-170. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Restricted Delivery.

a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Restricted Delivery fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. Isn't it true that if the Postal Service fails to establish standards and benchmarks, thereby failing to measure its level of successful performance, then a significant percentage of Restricted Delivery purchases will result in unsatisfactory service to customers? If this is not confirmed, then please explain.
f. Please provide response to parts a. – c., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

a-c, f. There are no such benchmarks, because they have not been seen as necessary to meet customer needs.

d. Standardized benchmarks are hard to establish and apply, since many variables may affect restricted delivery service.

e. Benchmarks are not the only method for getting employees to provide satisfactory customer service. Postal employee performance is routinely reviewed by their local managers. Moreover, establishing benchmarks for each special service would lead to so many benchmarks that their value would diminish, as employees would need to focus on a wide variety of directives, and monitoring of and messaging on benchmark performance would become unduly complicated.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-171. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Delivery Confirmation.
a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Delivery Confirmation fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. Isn't it true that if the Postal Service fails to establish standards and benchmarks, thereby failing to measure its level of successful performance, then a significant percentage of Delivery Confirmation purchases will result in unsatisfactory service to customers? If this is not confirmed, then please explain.
f. Please provide response to parts a. – c., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

The Postal Service seeks scan performance of 97 percent or greater for Delivery Confirmation service. Please see the response to OCA/USPS-32.

a. Delivery Confirmation scan performance goals were first established in FY 1999; however data on scan performance are available from only FY 2003 to the present.

b. No internal system was used to establish these goals.

c. Scan performances for FY2003, FY2004 and the first two quarters of FY2005 are:

	Priority	Package Services	FC Parcels
FY2005	98%	97%	95%
FY2004	98%	97%	95%
FY2003	97%	97%	94%

d-e. Not applicable

f. Data earlier than those in part c are not available.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-172. Please provide any internal (or external) standards or benchmarks the Postal Service has established for the successful provision of Signature Confirmation.
a. State when each individual standard or benchmark was established.
b. What is the internal system for establishing such standards or benchmarks?
c. For each standard or benchmark provided, state the percentage of time Signature Confirmation fails to meet, meets, or exceeds the standard or benchmark. Provide the figures underlying the calculation.
d. If the Postal Service has not established standards or benchmarks, explain why not?
e. Isn't it true that if the Postal Service fails to establish standards and benchmarks, thereby failing to measure its level of successful performance, then a significant percentage of Signature Confirmation purchases will result in unsatisfactory service to customers? If this is not confirmed, then please explain.
f. Please provide response to parts a. – c., for FY 2001, FY 2002, FY 2003, FY 2004, and FY 2005 to date.

RESPONSE:

The Postal Service seeks scan performance of 97 percent or greater on Signature Confirmation service. Please see the response to OCA/USPS-32.

a. Signature Confirmation scan performance goals were first established in FY 2001; however data on scan performance are available from only FY 2003 to the present.

b. No internal system was used to establish these goals.

c. Scan performances for FY2003, FY2004 and the first two quarters of FY2005 are:

	Priority	Package Services	FC Parcels
FY2005	96%	95%	94%
FY2004	96%	94%	94%
FY2003	95%	92%	91%

d-e. Not applicable

f. Data earlier than those in part c are not available.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-173. Please list all classes, products, and services (including all special services) eligible for refunds of postage.

a. State the circumstances under which the Postal Service will refund postage, by discrete class, product, and service.

b. For circumstances under which the Postal Service will refund postage, do these include complete failures to provide the service purchased so long as the customer can provide proof of failure? Please explain any negative answer. (Answer this question separately for each discrete class, product, or service).

c. E.g., if the Postal Service accepts an item for which Delivery Confirmation has been provided, but the acceptance scan is not reported, and a mailer claims the mailpiece was never delivered, will the Postal Service refund:

   b. the Delivery Confirmation fee?

   ii the postage for the underlying class of mail?

   iii. Please explain any negative answers.

RESPONSE:

The Postal Service does not explicitly exclude the possibility of refunds for any class of mail or special service, if the customer can support a refund claim, except for the permit imprint fee, and the COD, Express Mail insurance, insured, and registered mail fees after the Postal Service accepts the article. DMM section 604.10.2.6. See DMM sections 604.10.2.1a and 604.10.2.4.

a. See DMM section 604.10.2.

b. Yes, complete refunds are provided for postage and/or fees for the classes of mail and special services so long as the customer can prove that the service was not performed. See DMM section 604.10.2.1a.

c. If your use of the phrase "Delivery Confirmation has been provided" means a Delivery Confirmation delivery scan was provided absent an acceptance scan, then no fee refund or postage refund would be in order, as the special service paid for was performed and the mail piece was delivered.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

If your use of the term means neither a Delivery Confirmation delivery scan or acceptance scan was made, the customer would be entitled to a fee refund. Further, if the customer can prove no delivery of the mail piece, the customer would also be entitled to a postage refund. In this regard, the lack of a delivery scan does not necessarily mean that the mail piece was not delivered.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-174. Is it the policy of the Postal Service to provide at least one form of *free* delivery to every household and business in the U.S. if the recipient so desires? Please explain any negative answer.

RESPONSE:

The Postal Service provides one free form of delivery to households and business locations in the form of carrier delivery to approved receptacles for delivery of mail. Free post office box service is available to each household or business location for which the Postal Service declines to provide carrier delivery.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF THE OCA

OCA/USPS-175. Is it the policy of the Postal Service to provide delivery to every household and business in the U.S., at the location of the household or business (e.g., curbside box or cluster box) if the recipient so desires?

a. If not, please list all circumstances under which delivery at the recipient's location will not be provided.

b. If delivery is not provided at the recipient's location, say because of safety, zoning, or economic reasons, then will the Postal Service provide a *free* post office box (smallest size) to all such mail recipients at the nearest postal facility containing postal boxes? Please explain.

c. If the Postal Service does not provide carrier delivery at the recipient's location, but does provide free post office boxes (smallest size) in lieu of carrier delivery, what will the Postal Service provide to the recipient if all of the smallest size post office boxes are in use?

d. In instances in which carrier delivery is not provided to a recipient, will the Postal Service provide only general delivery, and deny to the recipient a free post office box even if boxes are available? Please explain the circumstances under which this will (or may) occur.

RESPONSE:

Postal Service policy generally calls for carrier delivery to approved delivery receptacles for all business locations and residences; however, if the Postal Service chooses not to provide carrier delivery, then a free post office box of the size needed to hold that potential delivery point's mail volume is available from the post office that serves the potential delivery point. (A larger box would be provided if one of a smaller size is not available.) While no list of all possible circumstances under which a free post office box is provided has ever been developed, common reasons include: 1) an isolated residence that together with other potential delivery points cannot meet the regulations for extending carrier routes; 2) roads that are inadequate to permit regular use by a carrier's vehicle; 3) a potential delivery point that is within ¼ mile of a rural post office and not on a carrier's line or travel; or 4) how postal services have historically been provided. Free post office box service was introduced in part to address perceived

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF THE OCA**

unevenness in how carrier service is provided in various places. Some municipalities also implement regulations that preclude the Postal Service from providing carrier delivery service, often for perceived social benefits. In situations like this, where the Postal Service has not decided to forgo the provision of carrier delivery, no free post office box service is provided. See DMM 508.4.6.2-3. This situation exists nearby in Garrett Park, Maryland.

As a practical matter, the Postal Service provides carrier delivery to potential delivery points, which would mean an improved lot on which a business or residence is located. The word "recipient" in your question is more broad, extending, for example to customers who refuse to provide the necessary identification to obtain a free post office box and to others who have no interest in receiving mail at a residence or business. General delivery may be an option for these customers.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-176. In an article entitled, "U.S. Says New York Postal Workers Faked Express Delivery Times," published in the *New York Times* on October 4, 2003, it was reported that: "Postal workers in New York City falsified delivery dates for express mail to give the appearance the mail was delivered on time, according to a study by the United States Postal Service's Inspector General."

(a) Please provide a copy of the IG Report.
(b) Please report all other instances of falsified delivery dates for Express Mail in any other location in the country for FY 2001, 2002, 2003, 2004, and 2005 to date.
(c) Please report all instances of falsified delivery times for Express Mail in any location in the country for FY 2001, 2002, 2003, 2004, and 2005 to date.
(d) Please provide results of any Postal Service investigations of falsified Express Mail delivery dates or times conducted during FY 2001, 2002, 2003, 2004, and 2005 to date.
(e) Please describe any efforts to prevent the recurrence of falsified Express Mail delivery dates or times.

RESPONSE:

(a) Please see the attached.

(b)-(d) Please see the response to part (a). The Postal Service has no further responsive information.

(e) The Postal Service continually seeks to ensure that proper scanning procedures are followed. For example, managers in field offices conduct carrier scanning proficiency tests on an ongoing basis. In the morning, managers make a list of pieces that require scanning on particular routes. That evening or the following day, they monitor scanning reports to ensure that the carrier identified and scanned the pieces on the list, and then follow-up with the individual carriers concerning the test results. This follow-up may involve retraining on proper scanning procedures.

Attachment to OCA/USPS-176 (pg 1 of 8)

March 31, 2003

FRANCIA G. SMITH
VICE PRESIDENT AND CONSUMER ADVOCATE

NICHOLAS F. BARRANCA
VICE PRESIDENT, PRODUCT DEVELOPMENT

VINNIE MALLOY
MANAGER, NEW YORK DISTRICT

SUBJECT: Audit Report – Product Tracking System (Report Number AC-AR-03-005)

This report presents the results of our self-initiated review of the Product Tracking System (Project Number 01YG002AC000). This review included an evaluation of Express Mail manual entries of selected locations within the New York District. Our objectives were to determine whether management controls were adequate to ensure that system measurements contained within the Product Tracking System are reliable and to assess the reliability of the scanning data used to reflect the delivery status of mailpieces.

The process used to measure and report scanning data was adequate. Delivery information for Express Mail reported in the Product Tracking System was being filtered through a series of system code filters. In addition, mailpieces were rejected and excluded from the performance scores, if discrepancies were found. As a result, we believe the process used to gather performance data for Express Mail was reliable. However, we noted that an excessive amount of express mailing delivery data for the New York Metro District was inputted manually and not included in the performance data reported in the Product Tracking System. This occurred because carriers, clerks, and drivers used the manual function to avoid scanning and reporting Express Mail delivery failures. As a result, delivery times for this mail was incorrect. We recommended the Postal Service train delivery personnel in the use of scanners for manual entry in tracking and confirming products and issue guidance to supervisors to investigate falsified delivery times and manual entries that exceed the 5 percent threshold.

While management neither agreed nor disagreed with our recommendations the actions taken or planned should correct the issues identified in the report. Management's comments and our evaluation of these comments are included in the report.

Attachment to OCA/USPS-176 (pg 2 of 8)

We appreciate the cooperation and courtesies provided by your staff during the audit. If you have any questions or need additional information, please contact Larry Chisley, director, at (813) 261-5218 or me at (703) 248-2300.

B. Wayne Goleski
Assistant Inspector General
for Core Operations

Attachment

cc: Richard J. Strasser, Jr.
John A. Rapp
Ralph J. Moden
Anita J. Bizzotto
Jayne E. Schwarz
Susan M. Duchek

Attachment to OCA/USPS-176 (pg 3 of 8)

INTRODUCTION

Background

The Product Tracking System incorporates a series of system measurements using delivery scan data and produces a management summary report that reflects the delivery status of Express Mail. The information contained within the Product Tracking System is obtained through a handheld mobile data collection device also known as a "scanner." The scanner emits an infrared signal that captures the label information and stores it in the scanner for downloading into the Integrated Intelligent Management System. The Integrated Intelligent Management System is a stand-alone personal computer at each unit. Express Mail is the Postal Service's premium service offering next day delivery by 12 noon or 3 p.m. to most destinations. The Postal Service on time target performance score for Express Mail is 94 percent with improvement for Postal Service quarters three and four. The Postal Service established a 5 percent threshold for manual and multiple deliveries on Express and Delivery Confirmation products.

Objectives, Scope, and Methodology

Our objectives were to determine whether management controls were adequate to ensure system measurements contained within the Product Tracking System are reliable and to assess the reliability of the scanning data used to reflect the delivery status of mailpieces. To accomplish this we reviewed management reports from the Product Tracking System via the Web Enterprise Information System[1] for accounting periods 1 through 12, fiscal year 2002.[2] To determine how scanners operate, we reviewed the Handheld Scanner Training Guide and policies and procedures for Express Mail performance measures and service standards.

We also used summary data in the Web Enterprise Information System to identify Postal Service districts with the highest percentage of manual entries for Express Mail pieces.[3] We conducted on-site visits of selected units in the New York District to discuss Express Mail handling procedures. Sites included Church Street Station, Madison Square Station, Canal Street Station, Grand Central Station,

[1] The Web Enterprise Information System is the Postal Service web based Electronic Information System.
[2] Dates of that period were September 8, 2001, through August 12, 2002.
[3] Summary data from the Web Enterprise Information System was not verified for accuracy and completeness. Our objective did not include a validation of the Web Enterprise Information System.

Attachment to OCA/USPS-176 (pg 4 of 8)

Radio City Station, and Times Square Station. During these visits we interviewed New York District staff as well as the unit managers, customer service supervisors, clerks, drivers, and carriers at each location. We monitored the acceptance of Express Mail and reviewed information downloaded from scanners.

This audit was conducted from November 2001 through March 2003, in accordance with generally accepted government auditing standards and included such tests of internal controls as were considered necessary under the circumstances. We discussed our conclusions and observations with appropriate management officials and included their comments, where appropriate.

Prior Audit Coverage

Our report, Delayed Express Mail at a Tampa, Florida Facility (Report Number DE-AR-01-003, dated August 10, 2001), found that Express Mail was not always delivered or scanned in a timely manner. Postal Service management attributed these issues to a restriction on the payment of overtime. Postal Service officials stated the restriction was not intended for the Expedited Services Unit and promised to clarify the miscommunication. On a subsequent visit, the restriction had been lifted.

Attachment to OCA/USPS-176 (pg 5 of 8)

AUDIT RESULTS

Product Tracking System

The process used to measure and report scanning data was adequate. The system included a database that interfaced with customer call centers, retail terminals, the Internet, and other field systems. Handheld scanners were used to extract delivery information that is downloaded to a local computer that transmits to a Postal Service routed network. This information is then put through a series of system code filters[4] that identifies various events that would stop the clock or reject the mailpiece if there is a conflict. As a result, we believe that delivery information is being properly processed and reported. Although the process used to measure and report scanning data was adequate, we noted that input controls in the New York Metro District needed strengthening because an excessive amount of Express Mail delivery data was inputted manually.

We judgmentally selected and visited six sites in the New York District that exceeded the 5 percent threshold for inputting information into the scanners manually. During accounting period 10, the selected sites had manual entry percentages that ranged from 12 to 48 percent–more than the 5 percent threshold identified by management to be monitored.

Interviews of 31 carriers, clerks, and drivers disclosed that employees feared disciplinary personnel action for late delivery of Express Mail. These employees also stated that management would not accept any excuses for the late delivery of Express Mail and that officials expected all Express Mail to be delivered on time and in accordance with the service standard. As a result, these carriers and drivers used the manual function on their scanner to falsify delivery times giving the appearance that Express Mail packages were delivered on time, when in fact they were delivered after the stated service commitment. We also noted that the manual option was also used even in instances where the Express Mail package arrived on time. Carriers and drivers stated they were concerned with the time it took to key in each mail recipient's name after a delivery. Therefore, they keyed all the names at once using

[4] The Postal Service uses the Quick Basic Program to perform the actual validation batch process. This program has a summary data file that has 34 exclusionary flags and 57 advisory flags.

Attachment to OCA/USPS-176 (pg 6 of 8)

the manual option to avoid possible delivery failures. The Handheld Scanner Training User Guide explains that the manual input should only be used when the scanner was not working properly or when a scanner is not available for the clerk or carrier.

Using the manual options to enter the label identification and numbers will have the same effect as a scan, if the employees are unable to access the time of delivery field. However, we found that some carriers, drivers, and clerks interviewed were not aware of this option, even though they stated that they had received some training on the use of the scanners. As a result, the Track and Confirm[5] information viewed by customers was inaccurate and incorrectly reported on time delivery performance for the six sites visited in the New York District, which could adversely affect customer satisfaction and lead to loss of revenue.

Management stated they were unaware that manual entries for several of their Postal Service retail units were above the 5 percent threshold and their primary concern was on-time delivery scores for Express Mail. District management also stated that the New York District did not have a "no failure policy" with regard to Express Mail delivery and they had never instructed personnel to falsify delivery times. However, district officials stated they planned to reemphasize that the manual scanning feature should only be used when appropriate per district policy.

Recommendation

We recommend the manager, New York District:

1. Train delivery personnel in the use of scanners for manual entry in tracking and confirming products.

Management's Comments

Management neither agreed nor disagreed with the recommendation. Management stated service talks were given to all personnel regarding the inappropriate usage of manual data entry. Correspondence relative to the topic from headquarters, the New York Metro Area, and the New York District was distributed districtwide. Management's comments, in their entirety, are included in the appendix of this report.

[5] Track and Confirm is the database that is accessed from the Postal Service Internet web page.

Attachment to OCA/USPS-176 (pg 7 of 8)

Recommendation	2. Issue guidance that requires supervisors to investigate falsified delivery times and manual entries that exceed the 5 percent threshold.
Management's Comments	Management neither agreed nor disagreed with the recommendation. They stated weekly ranking reports are distributed throughout the district. Area reports are reviewed which enable comparison of performance to other districts in the area.
Evaluation of Management's Comments	Management's comments are responsive to recommendations 1 and 2 and the actions taken or planned should correct the issues identified in the report.

Attachment to OCA/USPS-176 (pg 8 of 8)

APPENDIX. MANAGEMENT'S COMMENTS

DISTRICT MANAGER/ POSTMASTER
NEW YORK DISTRICT

UNITED STATES POSTAL SERVICE

March 19, 2003

B. Wayne Goleski
Assistant Inspector General for Core Operations
Office of Inspector General
1735 North Lynn Street
Arlington, VA 22209-2020

SUBJECT: Transmittal of Draft Audit Report – Mail Tracking and Delivery Status Information System (Report Number AC-AR-03-DRAFT)

Reference is made to the above Draft Audit Report. Our comments regarding the recommendations are as follows:

Recommendation #1: Train delivery personnel in the use of scanners for manual entry in tracking and confirming products.

Response: Service talks were given to all personnel regarding the inappropriate usage of manual data entry. Correspondence relative to the topic from Headquarters, the New York Metro Area, and the New York District was distributed districtwide.

Recommendation #2: Issue guidance that requires supervisors to investigate falsified delivery times and manual entries that exceed the 5% threshold.

Response: Weekly ranking reports are distributed throughout the District. Area reports are reviewed which enable comparison of performance to other Districts in the Area.

As a result of the activity that the New York District has initiated, the District's score for manual scans in AP 6 was 0.82% and 0.74% in AP 7 Week 3. The New York District is now the top performing District in the New York Metro Area.

Vinnie Malloy

421 EIGHTH AVENUE, ROOM 3018
NEW YORK NY 10199-9998

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-178. The following statement was made at the website of postcom.org on June 16, 2005 (http://www.postcom.org/):

> *Word has it that the Postal Service is sitting on a whale of a lot* more cash than it originally disclosed to the Postal Rate Commission. If this is true, look for an errata to be filed at the PRC.

a. Please state whether the Postal Service has "a lot more cash than [was] originally disclosed to the Postal Rate Commission."
b. If the Postal Service does have a significant amount of cash over and above what was presented in its initial filing in the instant rate case, please state the precise amount that is different from initial figures. Explain the source of the discrepancy between the initial filing and the current financial situation.
c. Is it correct that errata will be filed at the Commission reflecting a significant amount of cash in excess of originally filed estimates? If not, why not?
d. If so, when will the errata be filed? Whose testimony and exhibits, and which library references, will be changed?

Response:

a. The Postal Service does not have more cash than that reflected in the current filing and knows of no basis for the quoted statement on the Postcom website. In fact, the average cash balance estimated for May 2005 ($3.2 billion)[1] was *approximately $400 million more than* the Postal Service's actual experience ($2.8 billion).
b. N/A
c. No. This is not correct.
d. N/A

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[1] Please see page 12 of the Errata to Postal Service Library Reference K-50, filed on June 9, 2005, which can be found in the electronic version in workbook IntIncExp_R05_corrected.xls, sheet FY2005 BR, cell N108).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS 179. Please explain where and how city carrier delivery supervisors obtain counts of accountable pieces each day. Address this separately for DOIS and non-DOIS offices.
a. Are city carrier delivery unit supervisors responsible for making these counts? If not, please explain.
b. For delivery offices that are in the DOIS system, are accountable volumes entered into DOIS each day?
i. If so, where do the counts come from?
ii. How are they entered?
iii. Are the counts made for each carrier route? An entire ZIP code? Please explain.
iv. Please provide a sample DOIS screen shot showing accountable volumes for a specific city carrier route.
c. For delivery offices not in the DOIS system, are counts of accountables made each day? How are the counts obtained? What is the postal form used to report the volume of accountables to be delivered on a particular carrier route? Please provide a copy of such a form.
d. In the Mail Count and Route Inspection Procedure for city carriers, is the number of accountables part of the evaluation? If so, where do the accountable volume counts come from? What is the rule of thumb for estimating the amount of time required to deliver accountables in the annual (or other periodic) Mail Count and Route Inspection Procedure.

Response:

A, B, and C. No daily count of accountable pieces is required or conducted in City carrier operations. Time for the daily handling of accountable mail is included in a City route's evaluation as fixed office time (see D below).

D. When evaluating a City route following the Mail Count and Route Inspection procedure, carriers and inspectors count the actual numbers of accountable pieces an assignment receives each day during the week of inspection. They also record the actual time necessary to receive the accountables and to get clearance for either returning receipts or the pieces upon returning to the office.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

There is no 'rule of thumb' regarding the allowance for handling accountables. If the average daily actual time during the week of inspection is more than six minutes, the assignment receives that average actual time for handling accountables. Otherwise, the route receives a minimum allowance of six minutes per day for handling accountables. The time necessary for handling accountables is a factor in the assignment's fixed office time.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-180. Please provide a copy of the May FY 2005 Financial and Operating Statement. Also furnish copies of the June, July, August and September FY 2005 Financial and Operating Statements when they become available.

RESPONSE:

These Statements are posted on usps.com when they become available.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-181. Please file a copy of the Operating Budget for FY 2006 at the time it becomes available and if the record is still open. Provide the level of detail requested in interrogatories OCA/USPS-T6-12 and -13.

RESPONSE:

This will be provided when available.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORIES OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-182. Please confirm that the screen shots produced by DOIS utilize an electronic database containing electronic data on volumes, workhours, routes, ZIP Codes, and mileage. If this is not confirmed, then please explain.
a. Is the database a Microsoft Access, or similar database? Please specify.
b. Also confirm that software is available to organize the data referenced in part a. according to specific organizational and sortation criteria. If this is not confirmed, then please explain.
c. Does the Postal Service ever generate reports for headquarters personnel using broad aggregations of the data referenced in part a.? If not, why not?
d. Do delivery unit supervisors ever generate reports at the route or ZIP-Code level using aggregations of the data referenced in part a.? If not, why not?

Response:

The DOIS system does not produce screen shots.

The DOIS system is a supervisor tool that records and reports, among other data, volume and workhour data by carrier and by carrier assignment. DOIS provides reports that summarize and trend that volume and workhour data and compare it to prior carrier performance and assignment base data. These data and reports are organized by carrier, by assignment, and by DOIS unit. A DOIS unit does not necessarily correspond to a ZIP Code. The assignment base data includes the authorized mileage for the assignment. DOIS does not track actual daily mileage.

A. The DOIS system uses mainframe DB2 database software.

B. SQL is the query language for DB2 databases.

C. The Postal Service has generated reports for HQ management showing broad aggregations of DOIS data. To date, these requests have been infrequent

and fulfilled using contracted resources. Because these requests have been so infrequent, the Postal Service does not maintain a staff of programmers familiar with both SQL and the data available in DOIS and the archived DOIS data files.

D. The DOIS system provides delivery unit supervisors many reports that include the referenced operational data. The Postal Service has demonstrated most of those reports for the OCA or has provided them as interrogatory responses. The responses to OCA/USPS-94-98 are examples.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-183. Please refer to the response to OCA/USPS-132(b), regarding Registered Mail costs.

a. For BY 2000, please confirm that the cost associated with international Registered Mail pieces inadvertently included in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Cost is $795,000 ($2,486,000 - $1,691,000). If you do not confirm, please explain.

b. For BY 2004, please confirm that the cost associated with international Registered Mail pieces inadvertently included in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Cost is $2,782,000 ($4,883,000 - $2,101,000). If you do not confirm, please explain.

c. For BY 2000, please confirm that the total cost for Registered Mail is $83,824,000 based on the costs for each cost segment shown in the table below. If you do not confirm, please explain and provide the correct figures.

	BY2000
	$
C/ S 1	375
CS / 2	4,133
CS / 3	43,556
C/S 4	56
C/ S 6	1,047
C/ S 7	5,337
C/ S 10	1,691
C/ S 11	4,722
C/ S 12	141
C/ S 13	12
C/ S 15	4,946
C/ S 16	2,031
C/ S 18	5,132
C/ S 20	10,645
TOTAL	83,824

d. For BY 2004, please confirm that the total cost for Registered Mail is $78,487,000 based on the costs for each cost segment shown in the table below. If you do not confirm, please explain and provide the correct figures.

	BY2004
	$
C/ S 1	303
CS / 2	4,341
CS / 3	46,975
C/S 4	51

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

C/ S 6	1,459
C/ S 7	5,692
C/ S 10	2,101
C/ S 11	3,489
C/ S 12	306
C/S 13	3
C/ S 15	3,528
C/ S 16	2,150
C/ S 18	3,408
C/ S 20	4,681
TOTAL	78,487

e. For BY 2000, please confirm that the C/S 10 Unit Cost figure of $0.19 was calculated using a total Registered Mail volume of 8,913,000. If you do not confirm, please explain.

f. For BY 2004, please confirm that the C/S 10 Unit Cost figure of $0.42 was calculated using a total Registered Mail volume of 5,008,595. If you do not confirm, please explain.

g. After removing the costs associated with international Registered Mail pieces inadvertently included in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Costs for BY 2000 and BY 2004, please discuss the causes of the 121.1 percent increase in C/S10 volume variable Registry costs.

RESPONSE:

a. Confirmed.

b. Confirmed.

c. Not confirmed entirely. The figure for C/S 10 is correct. The total of the other segments should sum, in thousands (000s), to $81,946.18, for a TOTAL of $83,637.18. The figure of $83,637.18 is calculated as follows: $84,619 - ($795 x 1.235*)

* piggyback from Docket No. R2001-1, USPS-LR-J-46, pp109-135.

d. Not confirmed entirely. The figure for C/S 10 is correct. The total of the other segments should sum to $75,898,150 for a TOTAL of $77,999,150. The figure of $77,999,150 is calculated as follows: $81,268,000 - (2,782,000 x 1.175)

e. Confirmed

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

f. Confirmed within rounding error. The $0.42 was calculated using a total Registered Mail volume of 5,009,000.

g. Although the Postal Service verifies that rural carrier costs have increased, the reasons are not known with certainty. However, a few things have happened in rural carriers. Even though the volume of registry mail has declined between FY 2000 and FY 2004, the number of rural routes has increased. Delivering less pieces over more routes implies an increase in unit cost.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-184. Please refer to the response to OCA/USPS-132(b), regarding Registered Mail costs.

a. Please confirm that for Fiscal Years 2001, 2002, and 2003, the Postal Service inadvertently included the costs associated with international Registered Mail pieces in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Cost. If you do not confirm, please explain. If you do confirm, please provide for each fiscal year the correct domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Costs, and the correct domestic Registered Mail costs for all other cost segments.

b. To what extent has the Postal Service inadvertently included the costs associated with international Registered Mail pieces in the domestic Registered Mail C/S10 (Rural Carrier) Volume Variable Costs for fiscal years prior to BY 2000? Please explain.

RESPONSE:

a. Confirmed. The original FY 2001 C/S 10 volume variable cost, in thousands (000), was $2,504. The revised FY 2001 C/S 10 volume variable cost is $1,619. The difference is $885 (000). When multiplied by the FY 2001 piggyback of 1.24, the amount of change in the other cost segments is $212 (000), for a total FY 2001 CRA Registry cost reduction of $1,097 (000), and a new volume variable total Registry cost of $89,699 (000).

The original FY 2002 C/S 10 volume variable cost, in thousands (000), was $3,099. The revised FY 2002 C/S 10 volume variable cost is $1,708. The difference is $1,391 (000). When multiplied by the FY 2002 piggyback of 1.254 the amount of change in the other cost segments is $353 (000), for a total FY 2002 CRA Registry cost reduction of $1,744 (000), and a new volume variable total Registry cost of $78,925 (000).

The original FY 2003 C/S 10 volume variable cost, in thousands (000), was $3,899. The revised FY 2003 C/S 10 volume variable cost is $1,789. The difference is

$2,110 (000). When multiplied by the FY 2003 piggyback of 1.181 the amount of change in the other cost segments is $382 (000), for a total FY 2003 CRA Registry cost reduction of $2,492 (000), and a new volume variable total Registry cost of $79,587 (000).

b. The Postal Service does not have the data available to make this determination. No data was collected prior to Q3 of FY 1999.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

OCA/USPS-185. Please refer to the response to OCA/USPS-132(b), regarding Registered Mail costs.

a. For BY 2000, please confirm that under the PRC Costing Methodology, the domestic Registered Mail C/S10 (Rural Carrier) cost would be $1,691,000. If you do not confirm, please explain and provide the correct figure.

b. For BY 2004, please confirm that under the PRC Costing Methodology, the domestic Registered Mail C/S10 (Rural Carrier) cost would be $2,101,000. If you do not confirm, please explain and provide the correct figure.

c. For BY 2000, please confirm that under the PRC Costing Methodology, the total cost for Registered Mail is $60,790,000 based on the Commission costs for each cost segment shown in the table below. If you do not confirm, please explain and provide the correct figures.

	BY2000 PRC $
C/S 1	375
CS / 2	2,634
CS / 3	24,993
C/S 4	20
C/S 6	1,047
C/S 7	5,152
C/S 10	1,691
C/S 11	4,848
C/S 12	171
C/S 13	11
C/S 15	4,880
C/S 16	1,427
C/S 18	3,546
C/S 20	9,995
TOTAL	60,790

d. For BY 2004, please confirm that under the PRC Costing Methodology, the total cost for Registered Mail is $50,227,000 based on the Commissions costs for each cost segment shown in the table below. If you do not confirm, please explain and provide the correct figures.

	BY2004 PRC $
C/S 1	303
CS / 2	2,261
CS / 3	20,893
C/S 4	15

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

C/ S 6	1,200
C/ S 7	4,848
C/ S 10	2,101
C/ S 11	4,722
C/ S 12	208
C/S 13	5
C/ S 15	4,742
C/ S 16	1,375
C/ S 18	2,091
C/ S 20	5,463
TOTAL	50,227

a. Confirmed

b. Confirmed.

c. Not confirmed entirely. The figure for C/S 10 is correct. The total of the other segments should sum, in thousands (000's) to $58,912.18 for a TOTAL of $60,603.18 The figure of $60,603.18 is calculated as follows: $61,585 - ((2,486-1,691) x 1.235)

* piggyback from Docket No. R2001-1, USPS-LR-J-46, pp. 109-135 (BY 2000 USPS piggyback since no PRC BY 2000 piggyback is available).

d. Not confirmed entirely. The figure for C/S 10 is correct. The total of the other segments, in thousands (000's) should sum to $47,603.77 for a TOTAL of $49,704.77. The figure of $49,704.77 is calculated as follows: $53,007 - ((4,883-2,101) x 1.187*). * USPS-LR-K-98, BYPack.PRC.xls. Please see also the revised page to USPS-LR-K-94 filed on June 22, 2005 for any sources that are not noted in this response.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-186. With respect to the single-piece First-Class first-ounce rate implemented June 30, 2002, and pursuant to this rate change:

a. Please identify the different nondenominated (i.e., U.S. Flag and Antique Toy, etc.) stamps issued having a postage value of $0.37.
b. Please provide the total number of nondenominated stamps printed.
c. Please provide the total number of nondenominated stamps distributed for sale.
d. Please provide the total number of nondenominated stamps sold.
e. Please provide the total number of (1) the nondenominated stamps having a postage value of $0.37 identified in subpart a. above, and (2) the $0.34 denominated stamps issued prior to June 30, 2002, recalled from distribution as unneeded inventory.
f. Please provide the total number of (1) the nondenominated stamps having a postage value of $0.37 identified in subpart a. above, and (2) the $0.34 denominated stamps issued prior to June 30, 2002, destroyed as unneeded inventory.
g. Please provide the total cost of designing the different nondenominated stamps identified in subpart a., above.
h. Please provide the total cost to print the nondenominated stamps.
i. Please provide the total cost to distribute the nondenominated stamps.
j. Please provide the total cost to sell the nondenominated stamps.
k. Please provide the total cost to recall from distribution as unneeded inventory (1) the nondenominated stamps having a postage value of $0.37 identified in subpart a. above, and (2) the $0.34 denominated stamps issued prior to June 30, 2002.
l. Please provide the total cost to destroy as unneeded inventory (1) the nondenominated stamps having a postage value of $0.37 identified in subpart a. above, and (2) the $0.34 denominated stamps issued prior to June 30, 2002.

Please explain all subparts that the Postal Service is unable to answer.

RESPONSE:

a. There were two basic stamp issues: U.S. Flag, single design; and Antique Toys, four designs.

b. Total nondenominated stamps printed, as identified in response to subpart (a): 5,944,040,000.

c. See the response to subpart (b) above.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

RESPONSE to OCA/USPS-186 (continued):

d. Sales at that time were tracked by face value rather than item number, so that specific sales of the nondenominated stamps cited in response to subpart (a) would be co-mingled with all other 37-cent stamps. It is estimated that 85-95 percent of the nondenominated stamps printed and distributed were sold in the period leading up to and following the rate change.

e. (1) & (2) Stamps are not withdrawn from sale because they are in excess as a result of a rate change and they are not recalled from distribution. These stamps are kept in circulation for sale with make-up rate stamps or, where possible, to make up postage rates for larger items deposited in the mail stream.

f. (1) & (2) Stamps are not destroyed as unneeded as a result of a new rate implementation. As stamps run their course, measured by usage, they are removed from sale.

g. The stamps cited in response to subpart (a) above were designed and ultimately issued as denominated postage stamps, so that there were no significant additional design costs associated with the creation of the nondenominated versions.

h. Total cost to print the stamps cited in response to subpart (a): $17,661,643.

i-l. See the responses to subparts (e) and (f). Otherwise, the Postal Service has no data that would isolate any of these particular costs.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-187. *With respect to the single-piece First-Class first-ounce rate* implemented June 30, 2002, and pursuant to this rate change:

a. Please identify the different nondenominated make-up rate stamps issued having a postage value of $0.03.
b. Please provide the total number of nondenominated make-up rate stamps printed.
c. Please provide the total number of nondenominated make-up rate stamps distributed for sale.
d. Please provide the total number of nondenominated make-up rate stamps sold.
e. Please provide the total number of (1) nondenominated make-up rate stamps having a postage value of $0.03 identified in subpart a., above, and (2) $0.01 denominated make-up rate stamps issued between January 7, 2001, and June 30, 2002, recalled from distribution as unneeded inventory.
f. Please provide the total number of (1) nondenominated make-up rate stamps having a postage value of $0.03 identified in subpart a., above, and (2) $0.01 denominated make-up rate stamps issued between January 7, 2001, and June 30, 2002, destroyed as unneeded inventory.
g. Please provide the total cost to print the nondenominated make-up rate stamps identified in subpart a., above.
h. Please provide the total cost to distribute the nondenominated make-up rate stamps.
i. Please provide the total cost to sell the nondenominated make-up rate stamps.
j. Please provide the total cost to recall from distribution as unneeded inventory (1) nondenominated make-up rate stamps having a postage value of $0.03 identified in subpart a., above, and (2) $0.01 denominated make-up rate stamps issued between January 7, 2001, and June 30, 2002.
k. Please provide the total cost to destroy as unneeded inventory (1) nondenominated make-up rate stamps having a postage value of $0.03 identified in subpart a., above, and (2) $0.01 denominated make-up rate stamps issued between January 7, 2001, and June 30, 2002,.

Please explain all subparts that the Postal Service is unable to answer.

RESPONSE:

a. None.

b. None.

c. None.

d. None

**RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY**

RESPONSE to OCA/USPS-187 (continued):

e. (1) N/A. (2) None. Denominated low-value stamps, such as 1-cent and 3-cent stamps, remain on sale indefinitely. They would not be recalled as unneeded inventory.

f. (1) N/A. (2) None.

g. N/A.

h. N/A.

i. N/A.

j. (1) & (2) N/A, see the response to subpart (f) above.

k. N/A.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-188. With respect to the single-piece First-Class first-ounce rate implemented January 7, 2001, and pursuant to this rate change:

a. Please identify the different nondenominated stamps issued having a postage value of $0.34.
b. Please provide the total number of nondenominated stamps printed.
c. Please provide the total number of nondenominated stamps distributed for sale.
d. Please provide the total number of nondenominated stamps sold.
e. Please provide the total number of (1) the nondenominated stamps having a postage value of $0.34 identified in subpart a., above, (2) the $0.33 denominated stamps issued prior to January 7, 2001, and (3) the nondenominated "H" rate stamps issued prior to January 7, 2001, recalled from distribution as unneeded inventory.
f. Please provide the total number of (1) the nondenominated stamps having a postage value of $0.34 identified in subpart a., above, (2) the $0.33 denominated stamps issued prior to January 7, 2001, and (3) the nondenominated "H" rate stamps issued prior to January 7, 2001, destroyed as unneeded inventory.
g. Please provide the total cost of designing the different nondenominated stamps identified in subpart a., above.
h. Please provide the total cost to print the nondenominated stamps.
i. Please provide the total cost to distribute the nondenominated stamps.
j. Please provide the total cost to sell the nondenominated stamps.
k. Please provide the total cost to recall from distribution as unneeded inventory (1) the nondenominated stamps having a postage value of $0.34 identified in subpart a., above, (2) the $0.33 denominated stamps issued prior to January 7, 2001, and (3) the nondenominated "H" rate stamps issued prior to January 7, 2001.
l. Please provide the total cost to destroy as unneeded inventory (1) the nondenominated stamps having a postage value of $0.34 identified in subpart a., above, (2) the $0.33 denominated stamps issued prior to January 7, 2001, and (3) the nondenominated "H" rate stamps issued prior to January 7, 2001.

Please explain all subparts that the Postal Service is unable to answer.

RESPONSE:

a. There were three basic and one special stamp issues: U.S. Farm Flag, single design; Flowers, four designs; Statue of Liberty, single design; and Love, single design.

b. Total nondenominated stamps printed, as identified in subpart (a):7,153,750,000.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

RESPONSE to OCA/USPS-188 (continued):

c. Same as (b) above.

d. Sales at that time were tracked by face value rather than item number, so that specific sales of the nondenominated stamps cited in (a) would be co-mingled with all other 34-cent stamps.

e. (1), (2) & (3) Stamps are not withdrawn from sale because they are in excess as a result of a rate change, and they are not recalled from distribution. These stamps are kept in circulation for sale with make-up rate stamps or, where possible, to make up postage rates for larger items deposited in the mail stream.

f. (1), (2) & (3) Stamps are not destroyed as unneeded as a result of a new rate implementation. As stamps run their course, measured by usage, they are removed from sale.

g. The stamps cited in (a) above were designed and ultimately issued as denominated postage stamps, so that there were no significant additional design costs associated with the denominated version.

h. No responsive information has been located.

i-l. See the responses to the subparts above. Otherwise, the Postal Service has no data that would isolate any of these particular costs.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-189. With respect to the single-piece First-Class first-ounce rate implemented January 7, 2001, and pursuant to this rate change:

a. Please identify the different nondenominated make-up rate stamps issued having a postage value of $0.01.
b. Please provide the total number of nondenominated make-up rate stamps *printed*.
c. Please provide the total number of nondenominated make-up rate stamps distributed for sale.
d. Please provide the total number of nondenominated make-up rate stamps sold.
e. Please provide the total number of (1) nondenominated make-up rate stamps having a postage value of $0.01 identified in subpart a., above, and (2) $0.01 denominated make-up rate stamps issued between January 10, 1999, and January 7, 2001, recalled from distribution as unneeded inventory.
f. Please provide the total number of (1) nondenominated make-up rate stamps having a postage value of $0.01 identified in subpart a., above, and (2) $0.01 denominated make-up rate stamps issued between January 10, 1999, and January 7, 2001, destroyed as unneeded inventory.
g. Please provide the total cost to print the nondenominated make-up rate stamps identified in subpart a., above.
h. Please provide the total cost to distribute the nondenominated make-up rate stamps.
i. Please provide the total cost to sell the nondenominated make-up rate stamps.
j. Please provide the total cost to recall from distribution as unneeded inventory (1) nondenominated make-up rate stamps having a postage value of $0.01 identified in subpart a., above, (2) $0.01 denominated make-up rate stamps issued between January 10, 1999, and January 7, 2001, and (3) the *nondenominated "H" rate make-up stamps issued between January 10, 1999,* and January 7, 2001.
k. Please provide the total cost to destroy as unneeded inventory (1) nondenominated make-up rate stamps having a postage value of $0.01 identified in subpart a., above, (2) $0.01 denominated make-up rate stamps issued between January 10, 1999, and January 7, 2001, and (3) the nondenominated "H" rate make-up stamps issued between January 10, 1999, and January 7, 2001.

Please explain all subparts that the Postal Service is unable to answer.

RESPONSE:

a. None.

b. None.

c. None.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO OCA INTERROGATORY

RESPONSE to OCA/USPS-189 (continued):

d. None

e. (1) N/A. (2) None. Denominated low value stamps, such as 1-cent and 3-cent stamps, remain on sale indefinitely. They would not be recalled as unneeded inventory.

f. (1) N/A. (2) None.

g. N/A.

h. N/A.

i. (1) & (2) N/A, see the response to (e) above.

j. (1) & (2) N/A, see the response to (f) above.

k. N/A.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-190. With respect to the single-piece First-Class first-ounce rate implemented (a) January 7, 2001, and (b) June 30, 2002, please identify all USPS incremental costs associated with these rate changes, such as advertising, public information, stamp production and distribution, window time, overtime, customer call center expense, collection of postage due, etc.

RESPONSE:

The Postal Service has not compiled responsive cost data that could be said to represent the incremental costs associated with implementing those particular rate changes.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-191. Please provide any economic, marketing, or other research, studies or reviews available to the Postal Service concerning the experience of foreign postal administrations that offer nondenominated postage to retail postal customers for single-piece items.

RESPONSE:

The Postal Service assumes that any research, studies, and reviews available to it are also available to the Office of the Consumer Advocate. Accordingly, in preparing a response to this interrogatory, the Postal Service has not solicited outside sources to determine the availability of any responsive materials not already in its possession.

In 2002, an e-mail inquiry was directed to the postal administrations in Great Britain, France and Italy. Attached is a summary of an e-mail chain reflecting the information obtained from Great Britain. Also attached is a copy of a print-out of the French e-mail response. There is no record of any response that may have been obtained from Italy.

Non-Value Stamps

Non-value Stamp: Royal Mail

Obtaining information on this program has been extremely difficult. There is no central contact for the program at Royal Mail and we have obtained information form at least six different individuals.

Royal Mail introduced "non-value" stamps approximately 13 years ago. At that time, stamp prices were increasing on an annual basis. The purpose of the non-value stamps is that even if the rate changes the stamp is still valid for the service. Accordingly, the price for the non-value stamp is always the current stamp price.

Royal Mail initial position was that that the non-value stamps offer a cost saving. When rates change, they do not have to withdraw stock and print new stamps at the new rate. This clearly had a more significant impact when prices changed on an annual basis. They also stated that positive PR was obtained from their introduction. Customers favored the use of non-value stamps as they could be used continually without having to add low value stamps to bridge the gap created when prices increased. The non-value stamps are available for first-class, second-class and Euro. Although not confirmed, they estimated that these services provide about 7.5 percent of total revenue.

Royal Mail has a current goal to change prices on regulated services every three to five years. Although they believe there is some escalation in purchase of the non-value stamps prior to a rate increase, they do not view this as a major problem. Essentially, there is no effort to limit these purchases. They merely sell the same non-value stamps at the new rate on the date the rate change is effective.

The use of non-value stamps presents a problem in determining the amount of deferred revenue (PIHOP – postage in hands of the public). Royal Mail sends post cards to selected customers and requests information on the number and type of stamps on hand. They do this on a monthly basis.

Clearly, in its present format, the use of non-value stamps is strictly for customer convenience. They believe there is extremely limited value in the program as it relates to the potential to earn interest on the funds obtained through the purchase of these stamps.

Set up mtg

Colvin, Jeff L - Washington, DC

From: bernard.roy@laposte.fr at INTERNET
Sent: Friday, July 12, 2002 6:21 AM
T/ Colvin, Jeff L - Washington, DC
C Beck, Carol - Washington, DC; Alenier, Howard S - Washington, DC; antoine.dimaggio@laposte.fr at INTERNET; joelle.toledano@laposte.fr at INTERNET
Subject: un-denominated stamps

X (2 KB) BERNARDR.VCF (259 B)

Dear Jeff,

We are very sorry for not answering sooner to your mail.

La Poste does offer non denominated stamps. They are available for the first weight step (below 20 grams) for urgent domestic mail. They are also used for international mail in Zone 1 (most european destinations) below 20 grams. They are always available, and for a lifetime. To my knowledge, no financial problem has been mentionned. Actually, I believe it's a good commercial thing, as people don't have to buy extra-stamps when there is an increase in prices...

I will forward this e-mail to Mr Antoine DI MAGGIO.
He is the head manager of the "national service of postal stamps and philately". He is the specialist of these questions, and is also a very good professional. If you need to investigate furthermore, he or one member of his team will be glad to answer your questions. You will find his e-mail on the list up front ; his telephone number is 33 1 44 [illegible] 00. He suggested to organize a telephone appointment to answer you, with a member of his team who is very fluent in english.

Best regards,
Bernard.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-192.

a. Has the Board of Governors' approved a policy opposing the issuance of a nondenominated single-piece, First-Class first-ounce stamp that would be sold to postal customers at a price equal to the single-piece, First-Class rate at the time of sale, and that postal customers could use that stamp without regard to subsequent changes in the single-piece, First-Class rate? If so, please elaborate.

b. Is Postal Service management opposed to the issuance of a nondenominated single-piece, First-Class first-ounce stamp that would be sold to postal customers at a price equal to the single-piece, First-Class rate at the time of sale, and that postal customers could use that stamp without regard to subsequent changes in the single-piece, First-Class rate? If so, please elaborate and provide any supporting research, analysis, studies, or other documents on which the Postal Service management bases its reasoning.

RESPONSE:

a. Neither the Board nor senior management has made a policy determination one way or the other.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO OCA INTERROGATORY

OCA/USPS-193.

a. Assume the Postal Service has issued a nondenominated single-piece, First-Class first-ounce stamp that is sold to postal customers at a price equal to the single-piece, First-Class rate at the time of sale, and that postal customers may use that stamp without regard to subsequent changes in the single-piece, First-Class rate. Is it the Postal Service's expectation that postage in the hands of the public would rise in anticipation of a subsequent increase in the single-piece, First-Class rate? Please explain and quantify the response.

b. Assume the Postal Service has issued a nondenominated single-piece, First-Class first-ounce stamp that is sold to postal customers at a price equal to the single-piece, First-Class rate at the time of sale, and that postal customers may use that stamp without regard to subsequent changes in the single-piece, First-Class rate. Is it the Postal Service's expectation that postage in the hands of the public would rise more if the expected percentage increase in the single-piece, First-Class rate is "large?" Please explain and quantify the response.

c. Assume the Postal Service has issued a nondenominated single-piece, First-Class first-ounce stamp that is sold to postal customers at a price equal to the single-piece, First-Class rate at the time of sale, and that postal customers may use that stamp without regard to subsequent changes in the single-piece, First-Class rate. Is it the Postal Service's expectation that it will earn more interest income for the time value of additional prepaid postage should postage in the hands of the public rise in anticipation of a subsequent increase in the single-piece, First-Class rate? Please explain and quantify the response.

RESPONSE:

a-c. The Postal Service has not evaluated possible changes in Postage in the Hands Of the Public if such a stamp were offered.

Response of the United States Postal Service
To Interrogatories of the Office of the Consumer Advocate
Redirected from Witness Thress

OCA/USPS-T7-8. The following refers to the National Payroll Hour Summary Report. For consolidated city delivery carrier hours, please provide: (1) Straight Time Hours (line 1); (2) Overtime Hours (line 2); and (3) Total Work Hours (line 10). Please provide the requested work hours for consolidated city delivery carriers for each month or reporting period, to coincide with the reporting period for total volumes of mail requested in OCA/USPS-T7-6, for the years FY 2000 – FY 2004. Please cite your sources and provide copies of all source documents not previously filed.

Response:

Please see the following table. For FY2000-FY2003, AP observations were obtained by differencing year-to-date hours from the previous report. In FY 2004, a report for AP 1 (following the "old" Postal Service fiscal year calendar) was followed by reports at the pay period frequency. Thus, "AP 2" of FY 2004 is the first two pay periods following AP 1 of the "old" PFY 2004, "AP 3" is the difference of the YTD hours through pay period 4 from "AP 2," and so on.

Response of the United States Postal Service
To Interrogatories of the Office of the Consumer Advocate
Redirected from Witness Thress

Carrier Workhours from National Payroll Hours Summary Reports

		City Carriers Consolidated			Rural Carriers Consolidated		
Year	AP	Line 01	Line 02	Line 10	Line 01	Line 02	Line 10
2000	01	32,553,147	4,175,349	36,951,126	12,616,583	288,305	12,905,232
2000	02	31,528,112	4,963,838	36,856,627	12,307,798	417,704	12,746,502
2000	03	30,005,327	5,300,160	35,824,578	11,895,795	339,134	12,235,745
2000	04	31,712,333	4,827,760	37,077,782	12,531,419	679,073	13,354,636
2000	05	30,081,915	4,538,185	34,990,111	12,054,990	277,095	12,358,885
2000	06	31,144,735	4,533,406	36,091,127	12,561,691	289,021	12,875,912
2000	07	32,623,324	4,307,060	37,246,929	13,096,029	305,898	13,402,399
2000	08	32,356,428	4,162,348	36,819,327	13,112,418	308,373	13,420,959
2000	09	32,164,781	4,357,044	36,815,288	13,110,626	288,835	13,399,533
2000	10	30,197,955	4,209,211	34,845,195	12,499,439	233,780	12,757,067
2000	11	29,696,596	4,327,657	34,449,520	12,481,865	311,194	12,794,403
2000	12	31,007,358	4,876,509	36,213,217	13,028,500	425,183	13,453,763
2000	13	30,006,349	4,774,562	35,180,628	12,565,466	372,257	12,961,987
2001	01	32,465,128	4,576,465	37,330,980	13,128,381	424,434	13,553,063
2001	02	31,364,331	5,497,486	37,285,349	12,708,446	533,186	13,265,816
2001	03	29,842,944	5,735,510	36,137,004	12,072,794	493,474	12,634,588
2001	04	32,021,127	5,155,583	37,563,353	12,842,245	927,247	13,796,916
2001	05	29,845,365	4,860,996	35,194,068	12,156,188	445,360	12,650,604
2001	06	31,067,860	4,224,267	35,716,931	12,746,386	380,209	13,151,443
2001	07	32,494,504	3,846,204	36,644,851	13,305,029	366,037	13,671,194
2001	08	32,305,776	3,864,002	36,459,097	13,328,225	372,177	13,700,450
2001	09	32,388,916	3,610,737	36,286,104	13,326,918	321,054	13,648,060
2001	10	30,324,683	3,565,971	34,292,756	12,751,239	281,471	13,056,982
2001	11	29,758,106	3,824,168	33,981,013	12,767,765	320,233	13,090,510
2001	12	30,956,821	4,154,139	35,342,886	13,314,030	330,780	13,644,922
2001	13	29,907,286	4,209,467	34,447,081	12,841,969	286,201	13,151,546
2002	01	32,173,088	3,705,781	36,102,954	13,421,258	277,373	13,698,863
2002	02	30,887,353	4,198,745	35,506,351	12,940,108	326,063	13,289,579
2002	03	29,204,230	4,632,492	34,268,010	12,299,324	368,804	12,693,288

Response of the United es Postal Service
To Interrogatories of the Office of the Consumer Advocate
Redirected from Witness Thress

Hours from National Payroll Hours Summary Reports

		City Carriers Consolidated			Rural Carriers Consolidated		
Year	**AP**	**Line 01**	**Line 02**	**Line 10**	**Line 01**	**Line 02**	**Line 10**
2002	04	31,454,656	3,715,381	35,456,030	13,046,089	574,719	13,624,328
2002	05	29,333,125	3,642,297	33,353,808	12,363,436	286,724	12,677,032
2002	06	30,353,324	3,726,576	34,391,532	12,971,090	273,420	13,268,710
2002	07	31,707,421	3,706,645	35,587,097	13,434,932	303,812	13,738,912
2002	08	31,345,933	3,696,106	35,234,817	13,546,660	296,410	13,843,126
2002	09	31,419,907	3,642,596	35,273,368	13,131,751	240,912	13,372,687
2002	10	29,384,224	3,715,284	33,414,167	12,197,113	197,515	12,409,372
2002	11	28,818,598	4,001,746	33,116,773	12,182,505	240,277	12,423,654
2002	12	30,002,371	4,211,852	34,380,261	12,692,284	251,500	12,943,824
2002	13	28,765,981	4,327,182	33,358,463	12,224,625	224,848	12,465,057
2003	01	31,234,392	3,969,412	35,370,713	12,836,718	240,645	13,077,531
2003	02	29,986,761	4,622,557	34,901,439	12,364,200	304,274	12,685,010
2003	03	28,580,568	4,681,607	33,664,146	11,828,483	307,366	12,152,857
2003	04	30,592,718	4,262,397	35,149,374	12,563,317	692,896	13,258,029
2003	05	28,475,820	3,957,501	32,818,237	11,864,215	268,117	12,150,444
2003	06	29,467,378	4,182,348	33,969,605	12,380,354	254,353	12,653,987
2003	07	30,811,530	4,147,056	35,161,147	12,879,512	257,616	13,137,272
2003	08	30,763,191	3,894,724	34,889,318	12,956,735	275,818	13,232,577
2003	09	30,537,676	3,946,062	34,737,521	12,938,236	239,174	13,177,402
2003	10	28,686,023	3,804,043	32,839,861	12,394,475	215,875	12,628,070
2003	11	28,004,152	4,020,835	32,372,814	12,370,675	247,384	12,619,243
2003	12	29,202,792	4,486,598	33,900,472	12,950,905	281,782	13,232,751
2003	13	28,090,446	4,484,910	32,874,659	12,479,295	250,960	12,747,807
2004	01	30,435,616	4,199,457	34,843,295	13,126,743	261,214	13,388,093
2004	02	29,196,677	4,474,995	34,045,448	12,608,571	318,249	12,944,932
2004	03	27,763,562	4,766,201	33,006,152	12,037,758	338,869	12,379,715
2004	04	29,741,739	4,519,895	34,584,468	12,820,526	645,407	13,467,269
2004	05	27,623,238	4,218,892	32,250,015	12,044,602	284,432	12,348,378
2004	06	28,828,653	4,623,282	33,806,435	12,606,165	290,475	12,917,360

Response of the Unitec es Postal Service
To Interrogatories of the Office of the Consumer Advocate
Redirected from Witness Thress

Hours from National Payroll Hours Summary Reports

		City Carriers Consolidated			Rural Carriers Consolidated		
Year	AP	Line 01	Line 02	Line 10	Line 01	Line 02	Line 10
2004	07	30,106,634	4,068,016	34,415,125	13,142,933	280,127	13,423,220
2004	08	29,753,782	4,188,389	34,203,214	13,193,742	306,633	13,500,423
2004	09	29,869,482	4,184,342	34,322,337	13,301,002	290,098	13,591,148
2004	10	26,998,179	3,908,492	31,288,084	12,213,826	232,660	12,465,814
2004	11	27,565,145	4,500,888	32,484,715	12,807,018	314,420	13,141,966
2004	12	28,603,257	4,847,182	33,719,868	13,329,099	366,200	13,695,507
2004	13	28,840,928	4,635,171	33,736,999	13,386,091	312,406	13,698,593

Response of the United States Postal Service
To Interrogatories of the Office of the Consumer Advocate
Redirected from Witness Thress

OCA/USPS-T7-9. The following refers to the National Payroll Hour Summary Report. For consolidated rural carrier hours, please provide: (1) Straight Time Hours (line 1); (2) Overtime Hours (line 2); and (3) Total Work Hours (line 10). Please provide the requested work hours for consolidated rural carriers for each month or reporting period, to coincide with the reporting period for total volumes of mail requested in OCA/USPS-T7-6, for the years FY 2000 – FY 2004. Please cite your sources and provide copies of all source documents not previously filed.

Response:

Please see the table provided in response to OCA/USPS-T7-8.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T10-2. Please refer to USPS-LR-K-5, file "ExA_BY04.CRpt.xls," and the table accompanying OCA/USPS-T10-1, above.

a. Refer to C/S 3, Clerks and Mailhandlers – CAG A-J Offices. Please explain the 90.2 percent increase in unit costs between FY 2000 and FY 2004, which constitutes 66.2 percent of the total unit cost increases for those cost segments experiencing increases.

b. Please identify and explain any changes in postal operations that may have caused the 90.2 percent increase in C/S 3 unit costs between FY 2000 and FY 2004.

c. Refer to C/S 10, Rural Carriers. Please explain the 242.2 percent increase in C/S 10 unit costs between FY 2000 and FY 2004, which constitutes 10.3 percent of the total unit cost increases for those cost segments experiencing increases.

d. Please identify and explain any changes in postal operations that may have caused the 242.2 percent increase in C/S 10 unit costs between FY 2000 and FY 2004.

Response:

(a) and (b) The volume variable costs for mail processing/window service for Registry have increased 7.85 percent (from $43,556 (000) in Docket No. R2001-1, BY2000 to $46,976 (000) in Docket No. R2005-1, BY/FY 2004), less than the productive hourly rate increase of 22 percent (from Docket R2001-1, LR-J-50 base year wage rate of $27.07 and LR-K-50 Docket No. R2004-1 $33.09 base year wage rate) for Cost Segment 3 from Base Year 2000 to Base Year 2004. It is the 44 percent volume drop that results in the 92 percent unit cost increase. Registered Mail costs are fairly independent of volume. Another way of saying this is to say that there are economies of scale in Registry so that costs do not rise as fast as volume. Unfortunately, declining volumes mean the economies of scale work in the opposite direction, in that costs do not *fall* as fast as volume. We are not aware of any operational changes that would cause Registered Mai's cost to increase significantly.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Response to OCA/USPS-T10-2 (continued)

(c) and (d). We are not aware of any operational changes that had significant impact on the rural carrier operations related to Registered Mail. However, it is useful to note that in the Rural Carrier Cost System, a system that measures mail volume delivered on rural routes, there has been a continuous *increase* in Registry pieces delivered on rural routes, as opposed to a continuous *decrease* in national level (RPW) Registry pieces.

Also note that the volume variable rural carrier costs found in C/S10 did increase between BY 2000 and FY 2004 for Registry, but the volume variable cost increased not 242.2 percent but 96.4 percent (Source: Percent change in FY 2004 volume variable cost for Registry of $4.88 million found in Docket No. R2005-1, USPS-T-9, Exhibit A, page A-11; and BY2000 volume variable cost for Registry of $2.486 million found in Docket No. R2001-1, USPS-T-11, Exhibit A, page 34).

Rural carrier costs of $4.883 million (Docket No. R2005-1, USPS-T-9, Exhibit A, page A-11) account for only 6 percent of Registry's total volume variable cost of $81.3 million (Docket No. R2005-1, USPS-T-9, Exhibit A, page A-2). So although the rural carrier costs increased, the increase only affected 6 percent of Registry's cost.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T10-3. Please refer to USPS-LR-K-5, file "ExA_BY04.CRpt.xls," and the table accompanying OCA/USPS-T10-1, above. For all cost segments other than C/S 3, C/S 10, C/S13, and C/S 20, please identify and explain any changes in postal operations between FY 2000 and FY 2004 that may have caused the percent increase in unit costs shown in column [4].

Response:

We are not aware of any operational changes that had significant impact on the operations in these cost segments related to Registered Mail.

Consider the information in the following table:

Registry Volume and Volume Variable Cost

FY2000 Volume [1] (000s)	FY2004 Volume [2] (000s)	Registry Volume % Change
8,913	5,009	-44%

BY2000 Volume Variable Cost [3] ($000s)	FY2004 Volume Variable Cost [4] ($000s)	Registry Volume Variable Cost % Change
84,619	81,268	-4%

Sources:
[1] Docket No. R2001-1, USPS-T-11, Exhibit C, page 4

[2] Docket No. R2005-1, USPS-T-9, Exhibit C, page C-4

[3] Docket No. R2001-1, USPS-T-11, Exhibit A, page 8

[4] Docket No. R2005-1, USPS-T-9, Exhibit A, page A-2

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Response to OCA/USPS-T10-3 (continued)

This table shows the total volume variable cost for Registry declined between Base Year 2000 and Base Year/Fiscal Year 2004 from $84.6 million to $81.3 million, a decline of 4 percent. Volume, on the other hand, dropped 44 percent between FY 2000 and FY 2004 from 8.9 million to 5.0 million.

The total cost for Registered Mail has been declining steadily. For example, in the base year (FY1998) from Docket No. R2000-1, the cost for Registered Mail was $99.3 million, Exhibit USPS-11C, page 8. In Docket No. R2001-1, the BY2000 volume variable cost for Registered Mail was $84.6 million (Exhibit 11A, Page 8). In the instant proceeding, the FY 2004 cost for Registered Mail declined to $81.3 million, Exhibit USPS-9A, page A-2. The FY 2005 Registered Mail cost declines to $74.0 million, USPS-T-10, Exhibit USPS-10E. The FY 2006 before rates cost for Registered Mail declines further to $69.5 million, USPS-T-10, Exhibit USPS-10G. The final, FY 2006 after rates cost is $65.3 million. USPS-T-10, Exhibit USPS-10I. The overwhelming reason for increases in Registered Mail's unit costs relates to the economies of scale that the Postal Services benefits from (when volume is rising, that is) for Registry. Unfortunately, declining volumes mean the economies of scale work in the opposite direction, in that costs do not fall as fast as volume. Because of such economies, the sustained, large drops in its volume cause unit costs to increase, despite the fact that total Registered Mail costs decline. Registered Mail has been losing significant volume annually. See USPS-T-7 at 201-06, and the Postal Service's response to interrogatory DBP/USPS-52.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

Response to OCA/USPS-T10-3 (continued)

Of the cost segments cited to explain in this particular interrogatory, the largest one (i.e. City Carrier Street Cost, C/S 7) contributes just 7 percent (i.e. $5.7/$81.3 million) of Registry's total volume variable cost. (Docket No. R2005-1, USPS-T-9, page A-9 is the source of the $5.7 million.) The cost segment that contains the overwhelming majority of Registry's cost is Cost Segment 3 with $47 million of its $81.3 million total volume variable cost. See the response to OCA/USPS-T10-2 (a) and (b) for a discussion of Cost Segment 3 costs.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T10-5.

a. Please confirm that the cost of Registered Mail pieces used by the Postal Service are treated as institutional costs of the Postal Service.

b. If you do not confirm subpart a. of this interrogatory, please provide the cost of Registered Mail pieces used by the Postal Service by cost segment and component for FY 2000 through FY 2004, and for the TYBR and TYAR.

c. If you do confirm subpart a. of this interrogatory, please provide the institutional cost of Registered Mail pieces used by the Postal Service for FY 2000 through FY 2004, and for the TYBR and TYAR.

Response:

a. Redirected to witness Meehan, USPS-T-9.

b. Redirected to witness Meehan, USPS-T-9.

c. Precise estimates of costs for individual products used by the Postal Service are not available. However, our best estimates of the portion of Postal Service Registry mail costs for mail processing and related costs are as follows: FY 2004 - $12.9 million; FY 2003 - $17.0 million; FY 2002 - $16.3 million; FY 2001 - $13.7 million; FY 2000 - $14.2 million. Due to aggregations in the test year, estimates for the TYBR and TYAR Postal Service Registered Mail costs are not available.

RESPONSE OF UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF THE OFFICE OF THE CONSUMER ADVOCATE

OCA/USPS-T10-6. Please refer to the file R2005.FY2006BRC-DRpt.USPS.AMX" in USPS-LR-K-6, showing the USPS version of cost segments and components for the TYBR, and the file "R2005.FY2006BRC-DRpt.PRC.AMX" in USPS-LR-K-95, showing the PRC version of cost segments and components for the TYBR. Also, please refer to Tables 1 and 2, below, which compare Postal Service and PRC cost segment 2 and 3 costs.

a. Refer to Table 1, below. With respect to Registered Mail for all but one cost component in C/S 2 (2.2 Supv. – Window Service), please explain for each cost component why the Postal Service estimates more volume variable costs than the Commission estimates attributable costs.

b. Refer to Table 2, below. With respect to Registered Mail for all but one cost component in C/S 3 (3.2 Window Service), please explain for each cost component why the Postal Service estimates more volume variable costs than the Commission estimates attributable costs.

REGISTERED MAIL
Comparison of 2006 TYBR Costs: USPS and PRC Version
Cost Segments 2 and 3

Table 1
Cost Segment 2: Supervisors and Technicians
Cost Components (000)

Supv - Mail Processing 2.1.1			Supv - Window Service 2.2			Supv - Admin Support 2.3		
		$ Chg. from			$ Chg. from			$ Chg. from
USPS	PRC	USPS	USPS	PRC	USPS	USPS	PRC	USPS
$2,111	$682	($1,429)	$396	$435	$39	$104	$60	($44)

Supv - City Delivery Carriers 2.4.1			Supv - Rural Delivery Carriers 2.4.2			Higher Level Supervisors 2.5.2		
		$ Chg. from			$ Chg. from			$ Chg. from
USPS	PRC	USPS	USPS	PRC	USPS	USPS	PRC	USPS
$433	$369	($64)	$48	$48	$0	$163	$88	($75)

Supervisor Training 2.5.5			Supv - Quality Control/Rev Protect 2.5.6			Joint Supv. Clerks/Carriers 2.5.7		
		$ Chg. from			$ Chg. from			$ Chg. from
USPS	PRC	USPS	USPS	PRC	USPS	USPS	PRC	USPS
$37	$19	($18)	$76	$27	($49)	$472	$235	($237)

TOTAL C/S 2		
		$ Chg. from
USPS	PRC	USPS
$3,840	$1,963	($1,877)

Table 2
Cost Segment 3: Clerks and Mailhandlers--CAGS A-J
Cost Components (000)

Mail Processing 3.1			Window Service 3.2			Administrative Clerks 3.3.1		
		$ Chg. from			$ Chg. from			$ Chg. from
USPS	PRC	USPS	USPS	PRC	USPS	USPS	PRC	USPS
$33,208	$10,134	($23,074)	$4,838	$5,311	$473	$1,516	$1,444	($72)

Time & Attendance 3.3.2		
		$ Chg. from
USPS	PRC	USPS
$114	$88	($26)

TOTAL C/S 3		
		$ Chg. from
USPS	PRC	USPS
$39,676	$16,977	($22,699)

Sources: USPS-LR-K-6, File: "R2005.FY2006BRC-DRpt.USPS.AMX"
USPS-LR-K-95, File: "R2005.FY2006BRC-DRpt.PRC.AMX"

Response to OCA/USPS-T10-6 (continued)

RESPONSE:

(a) and (b) The roll forward model that generates Test Year files (for example, as mentioned above, "R2005.FY2006BRC_DRpt.USPS.AMX.xls" in USPS-LR-K-6, showing the USPS version of cost segments and components for Test Year Before Rates, and the file "R2005.FY2006BRC_DRpt.PRC.AMX.xls" in USPS-LR-K-95, showing the PRC version of cost segments and components for Test Year Before Rates) uses Base Year costs as an initial input. Therefore, the direction of the differences between Test Year USPS volume variable costs and Test Year PRC attributable costs (regardless of whether the directional difference is an increase or a decrease) is explained by the differences in cost methodologies for the USPS version versus the PRC version in the Base Year, as well as from other input factors and adjustments (USPS version) received from various witnesses.

In addition, in R2005-1, the Base Year cost methodology for the USPS version was updated for mail processing (cost segment 3). The updates are described in the testimonies of witness Van-Ty-Smith (USPS-T-11) and witness Bozzo (USPS-T-12). As a result, the Base Year costs for supervisors (cost segment 2) which are impacted by the change in methodology in Base Year costs for mail processing (cost segment 3) are also affected.

Response to OCA/USPS-T10-6 (continued)

In general, the USPS and PRC versions of the roll forward model receive the same roll forward effects, including cost reductions and other programs. Therefore, the relative magnitude and direction of change in cost components in the Base Year, between the USPS volume variable costs and the PRC attributable costs, with respect to all classes of mail (not only to Registry), should be the same for both the USPS and PRC versions of the Test Year.

OCA/USPS-T10-7. Please refer to the files "R2005.FY2006BRC-DRpt.PRC.AMX" and "R2005.FY2006ARC-DRpt.PRC.AMX" in USPS-LR-K-95, showing the PRC version of cost segments and components for the TYBR and TYAR. Also, please refer to USPS-T-27, Exhibit USPS-27F, at page 6.

a. Based upon the PRC version of costs, please confirm that the TYBR total unit cost of Registered Mail is $11.24 ($44,865,000 / 3,990,000). If you do not confirm, please explain and provide the correct unit cost, providing citations to all figures used and showing all calculations.

b. Based upon the PRC version of costs, please confirm that the TYAR total unit cost of Registered Mail is $11.34 ($42,380,000 / 3,738,000). If you do not confirm, please explain and provide the correct unit cost, providing citations to all figures used and showing all calculations.

RESPONSE:

a. Not confirmed. See new page filed for USPS-LR-K-96 (filed June 22, 2005) on revised costs of Registered Mail in Test Year 2006 Before Rates for the PRC version. Based on the revised costs for Registered Mail in Test Year 2006 Before Rates for the PRC version, the average unit cost of Registered Mail in Test Year 2006 Before Rates is $10.54. See table following this response for the correct figures used in calculating unit cost for Registry in Test Year 2006 Before Rates.

For the USPS version, see new page 33 filed for testimony of witness Waterbury (USPS-T-10) (filed June 22, 2005) on revised costs of Registered Mail in Test Year 2006 Before Rates. Based on the revised costs for Registered Mail in Test Year 2006 Before Rates for the USPS version, the average unit cost of Registered Mail in Test Year 2006 Before

Response to OCA/USPS-T10-7 (continued)

Rates is $16.71. See table following this response for the correct figures used in calculating unit cost for Registry in Test Year 2006 Before Rates.

b. Not confirmed. See new page filed for USPS-LR-K-96 (filed June 22, 2005) on revised costs of Registered Mail in Test Year 2006 After Rates for the PRC version. Based on the revised costs for Registered Mail in Test Year 2006 After Rates for the PRC version, the average unit cost of *Registered Mail in Test Year 2006 After Rates* is $10.63. See table following this response for the correct figures used in calculating unit cost for Registry in Test Year 2006 After Rates.

For the USPS version, see new page 33 filed for testimony of witness Waterbury (USPS-T-10) (filed June 22, 2005) on revised costs of Registered Mail in Test Year 2006 After Rates. Based on the revised costs for Registered Mail in Test Year 2006 After Rates for the USPS version, the average unit cost of Registered Mail in Test Year 2006 After Rates is $16.77. See table following this response for the correct figures used in calculating unit cost for Registry in Test Year 2006 After Rates.

Response to OCA/USPS-T10-7 (continued)

R2005-1	Year	As Filed Registry Costs ('000s)	Revised Registry Costs ('000s)	Cost Difference Ratio	Volume for Registry as Filed ('000s)	Unit Cost for Registry as Filed	Revised Unit Cost for Registry
USPS	BY2004	81,268	77,999	.9598			
	TY2006BR	69,450	66,657	.9598	3,990	17.41	16.71
	TY2006AR	65,313	62,686	.9598	3,738	17.47	16.77
R2005-1	Year	As Filed Registry Costs ('000s)	Revised Registry Costs ('000s)	Cost Difference Ratio	Volume for Registry as Filed ('000s)	Unit Cost for Registry as Filed	Revised Unit Cost for Registry
PRC	BY2004	53,007	49,705	.9377			
	TY2006BR	44,865	42,070	.9377	3,990	11.24	10.54
	TY2006AR	42,380	39,740	.9377	3,738	11.34	10.63

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF PITNEY BOWES, INC.

PBI/USPS-1. Please list and describe with specificity the mail preparation and addressing requirements for First-Class Mail nonautomation presort letters.

RESPONSE:

The mail preparation standards for nonautomation First-Class Mail letters are found in Domestic Mail Manual (DMM®) 235 and 708. The addressing standards for nonautomation First-Class Mail letters are found in DMM® 202, 233, and 602.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF PITNEY BOWES, INC.

PBI/USPS-2. Please list and describe with specificity the mail preparation and addressing requirements for First-Class Mail automation presort letters.

RESPONSE:

The mail preparation standards for automation First-Class Mail letters are found in Domestic Mail Manual (DMM®) 235 and 708. The addressing standards for automation First-Class Mail are found in DMM® 202, 233 and 602.

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF PITNEY BOWES, INC.

PBI/USPS-4. Please define and describe with specificity the Mail Processing Total Quality Management ("MPTQM") program. Include, but do not limit your description to, a discussion of how the MPTQM program affects Postal Service transportation, mail processing, and delivery operations.

RESPONSE:

This information can be found at the following website: http://www.usps.com/mptqm/

RESPONSE OF UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF PITNEY BOWES, INC.

PBI/USPS-5. Please provide all Postal Service analyses, studies, or reports of the extent to which the MPTQM program improves mail quality and reduces Postal Service costs.

RESPONSE:

No such analyses, studies or reports have been conducted or produced.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF PITNEY BOWES INC. REDIRECTED FROM WITNESS SMITH

PBI/USPS-T13-1. Please refer to page 6 of USPS-LR-K-110 that presents the PRC-version of CRA mail processing costs for First-Class Mail automation letters and confirm the following unit mail processing costs for selected cost pools. If you do not confirm, please explain and provide the correct unit mail processing costs.

First-Class Mail Automation Letters Selected CRA Mail Processing Costs Source: USPS-LR-K-110	
COST POOL	TOTAL (cents)
MODS 13 1TRAYSRT	0.137
MODS 17 1DISPATCH	0.069
MODS 17 1OPBULK	0.029
MODS 17 1OPPREF	0.145
MODS 17 1OPTRANS	0.030
MODS 17 1PLATFRM	0.308
MODS 17 1PRESORT	0.004
MODS 17 1SCAN	0.032
MODS 18 1EEQMT	0.009
MODS 18 1MISC	0.035
MODS 18 ISUPPORT	0.014
MODS 99 1SUPP_F1	0.000
NON MODS ALLIED	0.243
NON MODS MISC	0.085

a. Please confirm that these CRA mail processing costs are the unit attributable mail processing costs for First-Class automation letters for each selected cost pool. If you do not confirm, please explain.
b. Please confirm that, generally, other classes and subclasses of mail have attributable mail processing costs for these selected pools. If you do not confirm, please explain.
c. Please confirm that, generally, there are institutional costs for these selected cost pools. If you do not confirm, please explain.
d. Please provide the volume variability for each selected cost pool and indicate whether or not it is derived using an econometric analysis.
e. Please described for each selected cost pool, the key used to distribute the volume variable costs to classes and subclasses.

Response: Confirmed, that the above unit costs are in agreement with page 6 of USPS LR-K-110.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF PITNEY BOWES INC. REDIRECTED FROM WITNESS SMITH

a. Confirmed that these are the PRC version mail processing unit costs for the test year provided in USPS LR-K-110, page 6.

b. Confirmed. (Please note that the "MODS 99 1SUPP_F1" cost pool has zero costs in the PRC version. Instead these same costs are provided in the MODS 18 1MISC and MODS 18 1SUPPORT cost pools.)

c. Confirmed.

d. For the mail processing labor variabilities by cost pool, see USPS-LR-K-100, part II. (Alternatively see spreadsheet "r2005 lr-k-100 pt 2".) These variabilities are not econometrically derived. The variabilities for equipment and facility-related costs are provided in USPS-LR-K-100, part VI and testimony of witness Smith, USPS-T-13, Attachment 7, respectively. The cost pools for equipment and facilities are different than those for labor, especially for equipment. These variabilities are also not econometrically derived, though statistical analyses were considered in developing the facilities variabilities (See Docket No. R76-1, testimony of Robert H. Sarikas, USPS-T-9).

e. For the mail processing labor distribution keys see USPS-LR-K-100, part II. (Alternatively see spreadsheet "r2005 lr-k-100 pt 2".) The distribution keys for equipment and facility-related costs are provided in witness Smith, USPS-T-13, Attachment 4, page 2 and witness Smith, USPS-T-13, Attachment 7, respectively. As noted in part d, the cost pools for equipment and facilities are different than those for labor, especially for equipment.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 2, QUESTION 2

2. Please provide total attributable costs by shape for Standard Mail and the electronic spreadsheets showing the development of these costs. The equivalent spreadsheets were filed as LR-J-199 containing file LR-J-199STDCBS_prc in Docket No. R2001-1. Please use the PRC costing methodology reflected in the Commission's decision in Docket R2001-1.

RESPONSE:

Please see USPS-LR-K-119, a Category 4 library reference, and USPS-LR-K-120, a Category 5 library reference, both filed today.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 2, QUESTION 3

3. Pages 13-14 of the word document file LR-K-99 contain a discussion of two changes to the methodology for computing mail processing unit costs by shape.

a. The first change concerns a modification to a calculation that uses the "final" reconciliation factor. A comparison of the cell formula contained in Excel file shp06prc, sheet "Letters (3)" in LR-K-99 with the corresponding cell formula in Docket No. R2001-1, LR-J-81, Excel file shp03prc, sheet "Letters (3)" shows no apparent difference in the calculation methodology. Please describe the difference in more detail showing the difference in the calculation.
b. The second change concerns a methodological modification that is used to shift flat costs from a combined pool of flat and parcel costs to a flats only cost pool. The adjustment is required because of the DMM/RPW definition of a flat. Is there a mismatch between the definition of shape in the IOCS and the DMM/RPW definition of a flat?
c. This procedure is applied only to Standard Regular mail. Why does it only affect Standard Regular and not ECR or any other subclass with both flats and parcels? Please provide a more detailed rationale for this adjustment.

RESPONSE:

Initially, simply to clarify, the "two changes" apparently intended to be addressed in this item are referenced on pages 12-13 of the Word document, rather than pages 13-14. Alternatively, in the hard copy preface, they appear on pages v and vi.

(a) The first change is not a methodology change, but rather one of the two changes made to adjust the results in Letters (3), Flats (3) and Parcels (3) sheets to obtain the respective Letters (4), Flats (4) and Parcels (4) sheet. The first change is identical to the calculation done in Docket No. R2001-1, LR-J-81, as indicated in the question. The second change is both a change/adjustment to the results in Letters (3), Flats (3) and Parcels (3) sheets to obtain the respective Letters (4), Flats (4) and Parcels (4) sheet and also a methodology change.

(b) Yes, this second change, a methodology change, is prompted by a mismatch between the DMM/RPW and IOCS on the definitions of flats and parcels. IOCS

defines flats as having a maximum thickness of 3/4th inch (See Docket No. R2000-1, USPS-LR-I-14, page 12-10). This corresponds to the DMM's general flats definition provided at DMM 301.1.1, which also provides for the same maximum thickness. However, Automation rate flats can be up to 1 1/4th inch thick as provided under 301.3.4.2. Thus the inconsistency occurs for flats automation rate pieces that are between ¾ th and 1 ¼ th inches thick. Such pieces would be treated as parcels by IOCS, but the RPW counts such pieces as flats. This is also discussed in the testimony of witness Smith, USPS-T-13, at pages 60-62.

(c) This procedure is only applied to Standard Regular rather than ECR because ECR doesn't have automation rates for flats. It is possible that First-Class and Periodicals presort flats may be subject to the same inconsistency. The focus on Standard Regular is due to the volumes for First-Class and Periodicals presort parcels are relatively small and due to the need to support the parcel rate surcharge for Standard Mail.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 2, QUESTION 6

6. Please provide the electronic version of the spreadsheets used to forecast international mail volume and revenue for FY 2005, FY 2006 (test year before rates) and FY 2006 (test year after rates). Exhibits USPS-27A, USPS-27B and USPS-27C. Please show international mail revenue from postage and fees separately. Please show the quarterly volume forecasts of international mail for 2005GQ1-2007GQ4 in the same manner witness Thress (USPS-T-7) has presented before- and after- rates quarterly volume forecasts of domestic mail in Attachment A of his testimony.

RESPONSE:

Please see USPS-LR-K-118, filed today.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 3, QUESTION 3(c)

3. Tables 3A to 3E show the development of passthrough percentages for all Standard Mail discounts based on the Postal Service's proposed rates. Tables 3A to 3D show the avoidable mail processing and delivery costs. Table 3E shows the avoidable cross docking and transportation cost. All costs reflect the Commission's methodology used in Docket No. R2001-1, as presented by the Postal Service in the current docket.

(c) Table 3C, lines 16 and 17, column 1 shows that the mail processing unit cost for a Basic ECR letter is greater than the mail processing unit cost for a Basic ECR nonletter. Please explain the reason for this counterintuitive result.

RESPONSE:

There are several reasons why the mail processing unit cost of Basic ECR letters (non-automation rate) is greater than that of Basic ECR nonletters. First, Basic ECR letters are often captured at and/or backhauled to the plant for DPS processing. Delivery units work closely with plants to identify machinable ECR letter bundles and trays to incorporate these pieces into the DPS mail stream. This additional distribution step at the plant, along with accompanying allied labor activities, increases mail processing costs of ECR letters relative to nonletters, all other things being equal.

In contrast, Basic ECR nonletters are not generally incorporated into plants' distribution mail streams, with the exception of pieces from broken bundles. As such, a greater proportion of Basic ECR nonletter costs arise from manual distribution and allied labor operations than do Basic ECR letter costs, since DPS is an automated process. Because the equipment- and space-related costs are lower for manual distribution operations than for automated distribution operations, a higher effective piggyback factor is applied to letters, which amplifies unit labor cost differences.

Also, the Standard Mail rate structure for letters encourages customers to prepare mail to qualify for automation rates (either 5-Digit presort or Auto Carrier Route), versus Basic ECR, when possible. This may lead the remaining Basic ECR

letters to have higher cost characteristics such as being physically non-machinable or lacking the necessary address elements to enable the application of a barcode. As of FY 2004, there were 2.5 billion fewer pieces of Basic ECR letters than in FY 2000, a decrease of 58 percent (compare volumes in LR-J-83 and LR-K-107). Please note that mail processing costs for Basic ECR letters have fallen, though not in proportion to the volume decline.

Finally, it is important to note that when Basic ECR automation and non-automation letters are combined, the resulting unit mail processing cost is below the Basic ECR nonletter cost. The Postal Service expects to consider alternative methods for disaggregating ECR letter costs prior to the filing of the next omnibus case.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 3, QUESTION 3(d)

3. Tables 3A to 3E show the development of passthrough percentages for all Standard Mail discounts based on the Postal Service's proposed rates. Tables 3A to 3D show the avoidable mail processing and delivery costs. Table 3E shows the avoidable cross docking and transportation cost. All costs reflect the Commission's methodology used in Docket No. R2001-1, as presented by the Postal Service in the current docket.

(d) Table 3C, lines 16 and 17, column 2, shows that the delivery unit cost for Basic ECR letter is substantially larger than the delivery unit cost for a Basic ECR nonletter. Please explain the reason for this counterintuitive result.

RESPONSE:

First, the 6.152 cent delivery unit cost reported in Table 3C of this POIR for Basic ECR Nonletters is incorrect. 6.152 equals the unit cost for Basic ECR Flats. The delivery unit cost for Basic ECR Nonletters is 6.173 cents, as shown in cell O103 of 'Summary TY'.

The reason the corresponding 9.694-cent delivery unit cost for ECR Basic Letters is so much higher is the way that the 'Rural Crosswalk' worksheet in LR-K-101 allocates total BY 2004 Rural Carrier Cost System (RCCS) volumes across shapes. Cell C25 in 'Rural Crosswalk' reallocates 1,395,586,000 RCCS ECR flats to ECR letters, based on the 'RCCS EVAL' analysis. These 1,395,586,000 reallocated flats account for over 29% of the original RCCS ECR total. Moreover, all 1,395,586,000 flats are reallocated to ECR Basic Auto letters and ECR Basic letters. Cell C39 in 'Rural Crosswalk' shows that this reallocation causes a corresponding reallocation of $72,417,000 in rural ECR Basic flats delivery costs to ECR letters. Furthermore, of this $72,417,000, $19,193,000 is allocated to ECR Basic Auto, and $53,224,000 to ECR Basic.

To facilitate the understanding of the effect of this reallocation done in "LR-K-101.xls",'Rural Crosswalk', the attached workbook called "LR-K-101.No,ECR.Crosswalk.xls" calculates the unit delivery costs without the Rural

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 3, QUESTION 3(d)

Crosswalk performed in "LR-K-101.xls". The cells that changed are shaded in each of the worksheets within the workbook "LR-K-101.No,ECR.Crosswalk.xls".

Cell B51 in the 'Rural Crosswalk' sheet of the attached file "LR-K-101-No-ECR-Crosswalk.xls" shows that without this $72,417,000 reallocation, the letter percentage of total rural ECR volume would equal only 24.1%, instead of the 41.5% that cell B51 in the current "LR-K-101.xls" 'Rural Crosswalk' calculates for ECR Letters. In addition, the flats percentage of this total would equal 75.9%, instead of 58.5%. These 24.1% and 75.9% allocations would, in turn, cause the BY 2004 total rural ECR Basic Letters cost to fall from the $87,820,000 that "LR-K-101.xls" calculates in cell J87 of 'Summary BY', to the $56,139,000 that "LR-K-101-No-ECR-Crosswalk.xls" calculates in cell J87 of its 'Summary BY'. They would also cause the BY 2004 total rural ECR Basic Nonletters cost to increase from the $158,097,000 in cell J102 of "LR-K-101.xls", 'Summary BY', to $279,742,000 in cell J102 of the "LR-K-101-No-ECR-Crosswalk.xls", 'Summary BY'. The piggyback-inflated rural ECR Basic letters unit cost would likewise fall, from 5.324 cents currently in cell N87, to 3.403 cents; the piggyback-inflated rural ECR Basic Nonletters unit cost would also increase, from 1.465 cents currently in cell N102, to 2.592 cents. Moreover, at these new rural delivery unit costs, the total BY 2004 city **plus** rural ECR Basic Letters unit cost would fall to 6.861 cents, and the corresponding ECR Basic Nonletters unit cost would increase to 6.334 cents. Finally, since the TY 2006 ECR Letter and Nonletter total unit delivery costs maintain the same proportional relationship to one another as do the BY 2004 Letter and Nonletter unit costs, the new TY 2006 unit costs would likewise be only slightly higher for ECR Basic Letters, specifically, 7.856 cents, than for ECR Basic Nonletters, namely 7.313 cents.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 3, QUESTION 3(d)

'Summary BY' in "LR-K-101-No-ECR-Crosswalk.xls" also shows why the rural ECR Basic Letters unit cost continues to still marginally exceed the rural ECR Basic Nonletters unit cost, even though the rural ECR flats that "LR-K-101.xls", 'Rural Crosswalk' moved into letters are now moved back into flats. This remaining small excess occurs because the ratio of the RCCS ECR Basic Letters over the Permit-Volume ECR Basic Letters in "LR-K-101-No-ECR-Crosswalk.xls", 'Summary BY' equals 0.855, as shown in cell S87, whereas the corresponding ratio of RCCS ECR Basic Nonletters over Permit-Volume ECR Basic Nonletters equals only 0.449, as shown in cell S102. To further illustrate this point, cells T87 and T102 show that, at 3.981 cents, the rural ECR Basic Letter cost per delivered piece – that is, per RCCS piece – **is,** as expected, substantially lower than the 5.767-cent rural ECR Basic Nonletter cost per RCCS piece.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 3, QUESTION 4(a)

4. Tables 4A, 4B, and 4C depict the calculated passthroughs, using the PRC costing methodology reflected in Docket No. R2001-1, for Parcel Post, Bound Printed Matter (BPM), and Media Mail/Library Rate (Media), respectively. The passthroughs were calculated using the avoided costs found in the Postal Service's version of PRC Parcel cost models, USPS-LR-K-103.

(a) Please confirm the avoidable unit costs, discounts, and percentage passthroughs shown in Tables 4A to 4C. Please provide corrections as appropriate.

RESPONSE:

(a) The avoidable unit costs, discounts (and surcharges) and percentage passthroughs shown in Tables 4A to 4C are confirmed with the following exceptions and qualifications:

- The citation in note 1 of Table 4A is not correct. It should read USPS-LR-K-103.
- The DSCF (3-digit) Nonmachinable Surcharge Cost Avoided is not correct. It should be calculated as the difference between the unit cost of a DSCF 3-digit sorted NMO and the weighted average unit cost of a DSCF piece. Calculated in this way, the avoided cost is $1.35. The passthrough then becomes 85%. Note 4 should then be adjusted accordingly.
- The BPM Costs Avoided, Proposed Discounts (and shape differential), and Calculated Passthroughs shown in Table 4B only reflect the per-piece elements of the cost and rate differentials shown in the table. The drop-shipment discounts also have per-pound components. The title to Table 4B should be modified to include "Per-Piece Elements Only."

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 3, QUESTION 4(a)

- BPM rates, discounts and differentials are customarily rounded to tenths of a cent. The Costs Avoided and Proposed Discounts in Table 4B are rounded to whole cents. This causes some slight discrepancies in the Calculated Passthroughs compared to the passthroughs that would have been calculated if the avoided costs and proposed discounts were both rounded to tenths of a cent before the passthrough calculation. Specifically, 58% would become 59%, 46% would become 45% and 103% would become 104%.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 3, QUESTION 4(c)

4. Tables 4A, 4B, and 4C depict the calculated passthroughs, using the PRC costing methodology reflected in Docket No. R2001-1, for Parcel Post, Bound Printed Matter (BPM), and Media Mail/Library Rate (Media), respectively. The passthroughs were calculated using the avoided costs found in the Postal Service's version of PRC Parcel cost models, USPS-LR-K-103.

(c) The cost avoidance for barcoded mail in Parcel Post was used as a proxy for the cost avoidance in BPM and Media Mail. Please confirm that a separate barcode cost avoidance was not calculated for BPM or Media and explain why the Parcel Post cost avoidance is a reasonable proxy.

RESPONSE:

(c) Confirmed. The Parcel Post barcode cost avoidance analysis is very limited in scope and reflects the tasks required for a Primary Parcel Sorting Machine (PPSM) clerk to key the 5-digit ZIP Code for a parcel-shaped mail piece. Given that Parcel Post, Bound Printed Matter, and Media Mail parcels are all processed on the PPSM, the use of this proxy is reasonable.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 3, QUESTION 5

5. Please provide the SAS output logs for MODS, NONMODS, BMC, and Other in LR-K-100.

RESPONSE:

LR-K-100 does not list the SAS logs separately for MODS, NONMODS, BMC and OTHER as LR-K-82 did in Docket No. R2001-1. This is because the SAS programs in LR-K-100 are executed in one data processing stream which combines the four data processing streams for MODS, NONMODS, BMC and OTHER shown in LR-K-82. The SAS logs from this one data processing stream are contained in zipped format in the SAS Logs directory of the diskette originally provided with LR-K-100. The SAS logs for MODS, NONMODS, BMC, and OTHER can be extracted from the SAS logs in LR-K-100. The order in which the programs are executed is listed in the JCL.rtf file. The SAS logs for MODS start with program MOD1POOL through programs M5ALLIED and MODSHAPE; those for nonMODS start with program NONMOD1 through programs N5ALLIED and NMDSHAPE; those for BMC start with program BMC1 through programs B5ALLIED and BMSHAPE; and those for OTHER start with program ADMWIN through the remaining programs listed in the JCL.rtf file.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 4, QUESTION 9

9. Please provide a copy of the special study associated with the variability factor of 61.22% listed in LR-K-93, workbook CS03, worksheet PRC 3.0.2.

RESPONSE:

The variability factor is not the result of a special study, but rather an IOCS SAS tally analysis. The Postal Service will revise the source reference name to reflect this in future proceedings. The variability factor is [100% minus the percentage of not handling tallies for Registry] or [1 - (the number of dollar weighted not handling Registry tallies/the number of dollar weighted total tallies)].

In R90-1, the percentage was 61.79%, shown in Docket No. R90-1, Appendix C, Workpaper 1, Page 1 of 5 of USPS-T-13, witness Barker. The corresponding Registry percentage in Docket No. R94-1 was 58.79%, shown in spreadsheet 3.0.2 of the B Workpapers of witness Barker, USPS-T-4. The Postal Service introduced new mail processing methods in Docket No. R97-1 and therefore no longer calculated the Registry variability in the same way as in Docket No. R94-1. Also in Docket No. R97-1, the Postal Service was not required to file a PRC version of worksheet 3.0.2, so there is no corresponding percentage for the base year (FY 1996).

The percentage of 61.22% appeared for the first time in the FY 1997 PRC version of the "B" workpapers, spreadsheet 3.0.2. We believe that the 61.22% was likely the result of the same calculation the Postal Service used prior to Docket No. R97-1, but performed using FY 1997 data, as this was both the first time the Postal Service produced PRC Versions of worksheet 3.0.2 and the first time the percentage appears.

In Docket No. R2000-1, the variability factor of 61.22% was included in the workpapers from the Postal Rate Commission, PRC-LR-5, "Segment 3 Costs and

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 4, QUESTION 9

Supporting Documentation Workpapers." (The Postal Service does not have Segment 3 PRC library references for Docket No. R97-1 or Docket No. R2001-1.)

To determine if the 61.22% was still suitable for the instant proceeding, an IOCS SAS tally analysis was run for FY 2004 with a result of 59.40%. Therefore, the Commission can determine which percentage is most appropriate for their use or choose some other method that is deemed more appropriate.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 5, QUESTION 2, PART 2

2. In response to Time Warner's request, the Postal Service has provided the IOCS flat files and mail processing tables for FY 2001 through FY 2003 indicating that certain cost changes took place in FY 2001. In 2004, the Postal Service submitted a complete set of the B Workpapers for FY 2003. Please provide the B Workpapers for FY 2001 and FY 2002 for both the PRC and the USPS versions.

RESPONSE:

For the requested PRC version, please see USPS-LR-K-131, B Workpapers For

FY2001, FY2002, PRC Versions in Response to POIR No. 5, Item 2.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 7, QUESTION 1(b)(i), 1(b)(iii), AND 1(b)(v)

1. In Docket No. R2001-1, the Postal Service provided several library references which utilized mainframe-based FORTRAN programs. The Presiding Officer requested that the Postal Service convert those FORTRAN programs from a mainframe to a PC-executable format. See Docket No. R2001-1, Tr. 5/951-52. In a report to the Presiding Officer, filed January 25, 2002, the Postal Service requested that it not be required to make the requested format conversion, arguing that the study supported by the documentation was not sufficiently germane to the settlement pending in that case to warrant the time and expense that conversion would likely entail.

Again, in R2005-1, a number of library references have been submitted using mainframe based FORTRAN programs. For example, in LR-K-84, three FORTRAN programs [cadoc04_rep.f, mpproc04_wgt.f, and sumclass_wgt_ecr.f] use the full FY 2004 IOCS data set [iocsdata.2004.dat.] to develop estimates of cost savings for ECR saturation mail. The program documentation included with LR-K-84 reflects the use of this full IOCS data set. The Postal Service submitted an edited data set [prc04flt.dat] with its filing (see USPS-LR-K-9) rather than the full data set required.

a) In order to allow the FORTRAN programs in LR-K-84 to be run and verified on a PC, please provide the following additional documentation:

i. A revised header file for the edited data set that is analogous to the iocs2004.h header file for the full data set. The header file shows the length and location of the various data fields in an IOCS data set record;
ii. Listings of the print statement output for all three programs. These listings are analogous to the SASLOGs included with the documentation for SAS programs;
iii. Electronic versions of the following intermediate and final data files created by the three above-cited FORTRAN programs: clk_mh_mp04.dat, clk_mh_aw04.dat, mp04_cra_wgt.data, and mp04cra_ecr.csv;
iv. Listings of the revised programs.

b) Using the LR-K-84 example and items "i." through "iv." provided above as a guide, please provide a PC-executable program, the relevant input data, and the related logs and files for the following library references:

i. USPS-LR-K-107 - PRC Version/Development of ECR Mail Processing Saturation Savings;
ii. USPS-LR-K-83 - Window Service Costs by Shape;
iii. USPS-LR-K-106 - PRC Version of Windows Service Costs by Shape;
iv. USPS-LR-K-86 - Bound Printed Matter and Parcel Post Mail Processing and Parcel Post Window Service Costs;
v. USPS-LR-K-109 - PRC Version/Bound Printed Matter Mail Processing Costs and Parcel Post Window Service Costs.

RESPONSE:

(b)(i) Please see USPS-LR-K-139.

(b)(iii) Please see USPS-LR-K-141.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 7, QUESTION 1(b)(i), 1(b)(iii), AND 1(b)(v)

(b)(v) Please see USPS-LR-K-143.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 2

2. Please provide the IOCS SAS tally analysis program which produced the variability estimate of 59.4% listed in response to POIR No. 4, question 9.

RESPONSE:

The program, which is available in hardcopy only, appears on the following page.

RESPONSE OF UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 2

```
*
* ANALYSIS OF REGISTRY - CLERK/MAILHANDLERS MAIL PROCESSING
*
************************************************************
;
DATA OUT;
 SET  IOC1.TALLY04;
 KEEP OPCODE HNDLING F244 DOLLR;

   IF F262 = '0060';

   IF F260 IN ('09', '10', '17', '24', '25', '26')
      OR F260 > '29' THEN DELETE;

   IF F129  < 'A' THEN F129  = '-';
   IF F9416 < 'A' THEN F9416 = '-';
   DOLLR = F9250/100000;

   HNDLING = 'NEITHER          ';
   IF F129 IN ('A', 'B') THEN HNDLING = 'HANDLING MAIL    ';
      ELSE
   IF F9416 =  'A'       THEN HNDLING = 'HANDLING MAIL    ';
      ELSE
   IF F129 =   'C'       THEN HNDLING = 'NO MAIL BUT SVC ';

   OPCODE = '                  ';
   OPCODE = F260||'                ';

   IF F260 = '00' THEN OPCODE = '00 POSTAGE DUE    ';
      ELSE
   IF F260 = '01' THEN OPCODE = '01 PREP. OF MAIL ';
      ELSE
   IF F260 = '02' THEN OPCODE = '02 OUTGO.PRIMARY ';
      ELSE
   IF F260 = '03' THEN OPCODE = '03 OUTGO.SECNDRY ';
      ELSE
   IF F260 = '04' THEN OPCODE = '04 INCOM.PRIMARY ';
      ELSE
   IF F260 = '05' THEN OPCODE = '05 INCOM.SENDDRY ';
      ELSE
   IF F260 = '06' THEN OPCODE = '06 NIXIE          ';
      ELSE
   IF F260 = '07' THEN OPCODE = '07 PLATFM.ACCEPT ';
      ELSE
   IF F260 = '08' THEN OPCODE = '08 PLATFM.OTH.WK ';
      ELSE
   IF F260 = '11' THEN OPCODE = '11 POST OFC. BOX ';
      ELSE
   IF F260 = '12' THEN OPCODE = '12 CALL. SERVICE ';
      ELSE
   IF F260 = '13' THEN OPCODE = '13 MIX.POBOX-CAL ';
      ELSE
   IF F260 = '14' THEN OPCODE = '14 CENT. MARKUP  ';
      ELSE
   IF F260 = '15' THEN OPCODE = '15 C.CARR. DIST. ';
      ELSE
   IF F260 = '16' THEN OPCODE = '16 R.CARR. DIST. ';
      ELSE
   IF F260 = '18' THEN OPCODE = '18 REGISTRY ONLY ';
      ELSE



   IF F260 = '20' THEN OPCODE = '20 SROT TO POBOX ';
      ELSE
   IF F260 = '21' THEN OPCODE = '21 EXPEDITED DLV ';
      ELSE
   IF F260 = '22' THEN OPCODE = '22 EXPRESS MAIL  ';
      ELSE
   IF F260 = '23' THEN OPCODE = '23 OTH.ACCNTABLE ';
      ELSE
   IF F260 = '27' THEN OPCODE = '27 C.DST.SEC/SEG ';
      ELSE
   IF F260 = '28' THEN OPCODE = '28 C.DST.ABC/WLK ';
      ELSE
   IF F260 = '29' THEN OPCODE = '29 C.DST.OTHER   ';

 PROC FREQ;
   TABLES OPCODE*HNDLING / NOPERCENT NOROW NOCOL;
   WEIGHT DOLLR;
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
POIR NO. 7, QUESTION 3

3. Please refer to the response to POIR 4, question 6. The table included in the response contains productivities adjusted to TY 2006 for sack activities. Refer also to USPS-LR-K-85, worksheet "Table 1." Please explain and reconcile the differences in productivities for the same activities.

Response:

In developing the cost savings from the elimination of less than 24 piece sacks in Periodicals, an error was made in adjusting the productivities to TY 2006. This error was corrected in USPS-LR-K-85. The response to POIR 4, question 6 should have used the same productivities found in USPS-LR-K-85. Errata to POIR 4, question 6 will be filed to reflect this.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 6

6. *In response to interrogatory MMA/USPS-T16-17, witness Kelley provides a set of* revised volumes for 'Delivery Volumes' worksheet in LR-K-101. Please explain why the BY City Carrier volumes (listed below) for First-Class Single-Piece and Presort listed in your response to MMA/USPS-T16-17 are different from the volumes listed in 'Delivery Volumes' worksheet, columns F, G, and H in LR-K-101.

LR-K-101.xls Worksheet Delivery Volumes				
	CS7 Distribution Key Inputs			
First-Class	CCS Letters	CCS Flats	CCS Parcels	Total CCS
Single-Piece	17,565,046	1,701,042	237,599	19,503,687
Presort	29,355,620	470,464	11,121	29,837,205
Witness Kelley's response to MMA/USPS-T16-17				
First-Class	CCS Letters	CCS Flats	CCS Parcels	Total CCS
Single-Piece	17,548,389	1,634,457	320,840	19,503,687
Presort	29,201,824	630,826	4,555	29,837,205

The initial filing of LR-K-101 did not include all the relevant spreadsheets used to create LR-K-101.xls. Please provide a revised version of LR-K-101.xls reflecting the changes proposed in response to MMA/USPS-T16-17 including all related supporting spreadsheets that are linked to LR-K-101.xls.

RESPONSE:

For an explanation regarding the volumes, please refer to the Postal Service's response to MMA/USPS-T16-22. For the revised version of the library reference requested, please see revised USPS-LR-K-101, filed on June 17, 2005.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 7 (PART 1)

7. A number of the SAS programs filed in LR-K-100 and LR-K-55 contain hardcoded figures such as those listed in the SAS program 'm5allied' in LR-K-100. Please identify the source of all hard-coded numbers used in LR-K-100 and LR-K-55.

RESPONSE:

(Question 7—Part 1) Hard-coded numbers used in LR-K-100 can be categorized into four groups as follows (in most of these cases, the tables were not shown in the LRs because the hard coded numbers are the same numbers that would have shown up in the tables):

1) PRC methodology for the allied operations (M5ALLIED, N5ALLIED, B5ALLIED).
2) Proportional Re-allocation of Clocking In and Out (Activity code '6522') and Standard Mail Mixed (Activity Code '5340') in program PREMITOT.
3) Adjustment for undistributed mixed mail items (Programs NONMOD12, NONMOD22.
4) Hard-Coded Data for MODS Cost Pools (DOLWGT)

1) PRC methodology for the allied operations (M5ALLIED, N5ALLIED, B5ALLIED).

Programs M5ALLIED, N5ALLIED, B5ALLIED replicate the PRC method used for allied cost pools shown in PRC-LR-5 in Docket R2000-1 whereby the subclass costs obtained from such method are substituted for the allied cost pool subclass costs obtained from programs MOD4DIST, NONMOD4, BMC4. Since the substitution applies to the subclass costs and not to the special services costs, the subclass costs resulting from the PRC method are adjusted so that they sum up in each allied cost pool to the total of all subclass costs obtained from MOD4 DIST, NONMOD4, BMC4. The adjustment is such that when all subclass costs are added to all other costs in each allied cost pool (such as special service costs, institutional costs, migrated costs), they sum up to the total accrued cost for the allied cost pool. The pool-specific adjustment is a ratio which includes in the numerator the allied cost pool total subclass costs obtained from MOD4DIST, NONMOD4, BMC4, and in the denominator the allied cost pool total subclass costs obtained from the application of the PRC method in M5ALLIED, N5ALLIED and B5ALLIED.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

For Program M5ALLIED, the ratios for each allied cost pool are hardcoded in the data step 'DATA ALLALLI' under the comment caption '--------adjust to cost pool $ PRC version----------' as listed below

```
DATA ALLALLI;
   SET ALLIEDDK NOTHDDST;
    IF POOL='1CANCEL ' THEN PRCCOSTS = DOLLAR*278183/290558  ;
    IF POOL='1DSPATCH' THEN PRCCOSTS = DOLLAR*205688/203329  ;
    IF POOL='1FLATPRP' THEN PRCCOSTS = DOLLAR*275458/253273  ;
    IF POOL='1MTRPREP' THEN PRCCOSTS = DOLLAR*31225 /30266   ;
    IF POOL='1OPBULK'  THEN PRCCOSTS = DOLLAR*218895/199905  ;
    IF POOL='1OPPREF ' THEN PRCCOSTS = DOLLAR*534377/477022  ;
    IF POOL='1OPTRANS' THEN PRCCOSTS = DOLLAR*122611/119122 ;
    IF POOL='1PLATFRM' THEN PRCCOSTS = DOLLAR*1212450/1220892 ;
    IF POOL='1POUCHNG' THEN PRCCOSTS = DOLLAR*133232/125838  ;
    IF POOL='1PRESORT' THEN PRCCOSTS = DOLLAR*7167 /39153;
    IF POOL='1SACKS_H ' THEN PRCCOSTS = DOLLAR*121111/119055  ;
    IF POOL='1SACKS_M ' THEN PRCCOSTS = DOLLAR*27907/26984  ;
    IF POOL='1SCAN    ' THEN PRCCOSTS = DOLLAR*76551/87925  ;
    IF POOL='1TRAYSRT ' THEN PRCCOSTS = DOLLAR*134448/12423 ;
```

The allied cost pool numerators for the ratios are generated in the beginning data step in M5ALLIED 'DATA CLASSES SP_EXMPT' which produces Table 1:

```
PROC FREQ DATA=CLASSES;
 TABLES POOL;
 WEIGHT PRCCOSTS;
TITLE1 'TABLE 1 ';
TITLE2 'POOL COSTS FOR CLASSES - EXCL SPEC.SERVICES & EXEMPT';
TITLE3 'COSTS TO BE USED IN NUMERATORS OF PRC ADJ FACTORS(TABLE 10)';
 FOOTNOTE 'BY 04 - MODS1&2 OFFICES - PRC VERSION';
```

TABLE 1
POOL COSTS FOR CLASSES - EXCL SPEC.SERVICES & EXEMPT
COSTS TO BE USED IN NUMERATORS OF PRC ADJ FACTORS(TABLE 10)

The FREQ Procedure

POOL	Frequency	Percent	Cumulative Frequency	Cumulative Percent
1CANCEL	278183	8.23	278183	8.23
1DSPATCH	205688	6.09	483871	14.32
1FLATPRP	275458	8.15	759329	22.47
1MTRPREP	31225.05	0.92	790554.1	23.39
1OPBULK	218894.9	6.48	1009449	29.87
1OPPREF	534376.8	15.81	1543826	45.68
1OPTRANS	122610.9	3.63	1666437	49.31
1PLATFRM	1212450	35.88	2878887	85.19
1POUCHNG	133232	3.94	3012119	89.13
1PRESORT	7166.587	0.21	3019285	89.35
1SACKS_H	121110.9	3.58	3140396	92.93
1SACKS_M	27907.05	0.83	3168303	93.76

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

1SCAN	76550.94	2.27	3244854	96.02
1TRAYSRT	134448.1	3.98	3379302	100.00

The allied cost pool denominators for the ratios are generated in M5ALLIED in the data step 'DATA ALLALLI' above the comment caption '--------adjust to cost pool $ PRC version----------' This data step produces Table 8:

```
PROC FREQ;
    TABLES POOL / MISSING;
    WEIGHT DOLLAR   ;
TITLE1 'TABLE 8. ';
TITLE2 'ALLIED OPERATIONS - ALL DIRECT, MIXED, AND NOT HANDLING';
TITLE3 'IOCS $ POOL TO BE USED FOR DENOMINATORS OF ADJ.FOR TABLE 10';
```

TABLE 8.
ALLIED OPERATIONS - ALL DIRECT, MIXED, AND NOT HANDLING
IOCS $ POOL TO BE USED FOR DENOMINATORS OF ADJ.FOR TABLE 10

The FREQ Procedure

POOL	Frequency	Cumulative Percent	Cumulative Frequency	Percent
1CANCEL	290557.6	8.76	290557.6	8.76
1DSPATCH	203328.9	6.13	493886.4	14.89
1FLATPRP	253272.7	7.63	747159.2	22.52
1MTRPREP	30265.54	0.91	777424.7	23.43
1OPBULK	199904.6	6.03	977329.3	29.46
1OPPREF	477022.3	14.38	1454352	43.84
1OPTRANS	119122.3	3.59	1573474	47.43
1PLATFRM	1220892	36.80	2794366	84.23
1POUCHNG	125838.3	3.79	2920204	88.02
1PRESORT	39152.79	1.18	2959357	89.20
1SACKS_H	119054.7	3.59	3078411	92.79
1SACKS_M	26984.03	0.81	3105395	93.61
1SCAN	87925.14	2.65	3193321	96.26
1TRAYSRT	124230.3	3.74	3317551	100.00

For Program N5ALLIED, the ratios for each allied cost pool are harcoded in the data step 'DATA ALLALLI1' as follows:

```
IF POOL='ALLIED' THEN VCOSTS=  COSTS*672073/638080  ;
IF POOL='MISC' THEN  VCOSTS=  COSTS*205848/224793  ;
```

The allied cost pool numerators for the ratios are generated in N5ALLIED in the beginning data 'DATA CLASSES SP_EXMPT' which produces Table 1:

```
PROC FREQ DATA=CLASSES;
      TABLES POOL;
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

```
      WEIGHT VCOSTS;
TITLE1 'TABLE 1 ';
TITLE2 'POOL COSTS FOR CLASSES - EXCL SPEC.SERVICES & EXEMPT';
TITLE3 'COSTS TO BE USED IN NUMERATORS OF PRC ADJ FACTORS(TABLE 10)';
```

TABLE 1
POOL COSTS FOR CLASSES - EXCL. SPEC. SERVCS & EXEMPT
COSTS TO BE USED IN NUMERATORS OF PRC ADJ FACTORS(TABLE 10)

The FREQ Procedure

POOL	Frequency	Cumulative Percent	Cumulative Frequency	Percent
ALLIED	672072.8	76.55	672072.8	76.55
MISC	205848.3	23.45	877921.2	100.00

The allied cost pool denominators for the ratios are generated in N5ALLIED in the data step 'DATA ALLALLI1' which produces Table 9a:

```
PROC FREQ;
    TABLES POOL*SHAPETYP/NOROW NOCOL NOPERCENT MISSING;
    WEIGHT  COSTS ;
TITLE1 'table 9a.';
TITLE2 'POOL COSTS TO BE USED IN THE DENOMINATORS OF TABLE 10';
```

table 9a.
POOL COSTS TO BE USED IN THE DENOMINATORS OF TABLE 10
The FREQ Procedure

Table of POOL by SHAPETYP

POOL / SHAPETYP	LETTER	FLAT	PARCEL	Total
ALLIED	343036	225691	69353	638080
MISC	168119	41129	15545	224793
Total	511155	266820	84897.8	862874

For Program B5ALLIED, , the ratios for each allied cost pool are harcoded in the data step 'DATA ALLALLI1' as follows:

```
COSTS = DOLLAR*GFY;
IF POOL='PLA ' THEN PRCCOSTS=COSTS*199549/202351;
IF POOL='OTHR' THEN PRCCOSTS=COSTS*337135/338310;*DENOM FR table 9;
```

The allied cost pool numerators for the ratios are generated in B5ALLIED in the beginning data step 'DATA CLASSES SP_EXMPT' which produces Table 1:

```
PROC FREQ DATA=CLASSES;
     TABLES POOL;
     WEIGHT PRCCOSTS;
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

```
TITLE1 'TABLE 1 ';
TITLE2 'POOL COSTS FOR CLASSES - EXCL SPEC.SERVICES & EXEMPT';
TITLE3 'COSTS TO BE USED IN NUMERATORS OF PRC ADJ FACTORS(TABLE 10)';
```

table 1:
POOL COSTS FOR CLASSES - EXCL. SPEC. SERVCS & EXEMPT
COSTS TO BE USED IN NUMERATORS OF PRC ADJ FACTORS(TABLE 10)
The FREQ Procedure

POOL	Frequency	Cumulative Percent	Cumulative Frequency	Percent
OTHR	337135.4	62.82	337135.4	62.82
PLA	199549.2	37.18	536684.6	100.00

The allied cost pool denominators for the ratios are generated in B5ALLIED in the data step 'DATA ALLALLI1' which produces Table 9a:

```
PROC FREQ;
     TABLES POOL;
     WEIGHT COSTS;
TITLE1 'TABLE 9a';
TITLE2 'TOTAL ALLIED POOL COSTS BY SHAPE - POOL $';
TITLE3 'EXCL. EXEMPT ACTV CODES & SPECIAL SRVCS ';
TITLE4 'TO BE USED AS DENOMINATORS IN TABLE 10  ';
```

TABLE 9a
TOTAL ALLIED POOL COSTS BY SHAPE - POOL $
EXCL. EXEMPT ACTV CODES & SPECIAL SRVCS
TO BE USED AS DENOMINATORS IN TABLE 10

The FREQ Procedure

POOL	Frequency	Cumulative Percent	Cumulative Frequency	Percent
OTHR	338310.3	62.57	338310.3	62.57
PLA	202350.6	37.43	540660.9	100.00

2) Proportional Re-allocation of Clocking In and Out (Activity code '6522') and Standard Mail Mixed (Activity Code '5340') in program PREMITOT.

2.a) Proportional Re-allocation of Clocking In and Out to BMC and non-MODS Premium Costs.

Program PREMITOT estimates the percent of mail processing premium costs for non-BMC facilities out of the total C/S 3 premium costs. Clocking in and out (actv=6522) premium costs are included in the MODS mail processing pool premium costs. However, they need to be reallocated between the administrative and mail processing portions of the premium tallies for

the BMCs and the non-MODS. Since the reallocation is proportional, BMC and non-MODS premium tallies can be inflated by hard coded clocking in/out 'inflation' factors. The hard-coded factors for each facility group consist of two ratios, one for the Night Pay and one for the Sunday Pay. The numerator for each ratio consists of the mail processing and non-mail processing premium tallies for the facility group, including those with actv=6522; the denominator consists of the mail processing and non-mail processing premium tallies for the facility group, excluding those with actv=6522. The hard coded numbers occur in PREMITOT where the comment caption indicates '*...clocking in/out inflation factors for premium tallies;' As indicated by the comment captions next to those numbers, the sources for the hard-coded numbers are from TAB3 and TAB1 for the BMCs, and TAB4 and TAB2 for the non-MODS as follows:

```
*...clocking in/out inflation factors for premium tallies;

                IF ACTV='6522' THEN DELETE;

 * + + +
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 7 (PART 1)

```
        PROC FREQ;
         TABLES NIGHT SUNDAY;
         WEIGHT DOLLAR;
TITLE1 'tab 3 - BMCS MAIL PROCESSING PREMIUM COSTS';
TITLE2 'DO NOT INCLUDE ALLOCATED 6522 COSTS';
TITLE3 'cost pools include fixed costs      ';
```

tab 1 - BMCS ADMWIN NIGHT AND SUNDAY PREMIUM COSTS
INCLUDE TOTAL 6522 PREMIUM COSTS
The FREQ Procedure
Table of ACTV by NIGHT

Frequency|NIGHT	ACTV 1	Total
OTHE	25576	25576
6522	6869.5	6869.5
Total	32445.4	32445.4

Table of ACTV by SUNDAY

Frequency|SUNDAY	ACTV 1	Total
OTHE	2997.7	2997.7
6522	1507.7	1507.7
Total	4505.43	4505.43

tab 3 - BMCS MAIL PROCESSING PREMIUM COSTS
DO NOT INCLUDE ALLOCATED 6522 COSTS
cost pools include fixed costs

The FREQ Procedure

NIGHT	Frequency	Percent	Cumulative Frequency	Cumulative Percent
1	352464.5	100.00	352464.5	100.00

SUNDAY	Frequency	Percent	Cumulative Frequency	Cumulative Percent
1	50644.22	100.00	50644.22	100.00

The PREMITOT program codes in the following data steps generate Tab 2 and Tab 4 for the non-MODS:

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

Data step 'DATA NMODADW NMOD6522;'

```
  PROC FREQ DATA=NMOD6522;
      TABLES ACTV*NIGHT ACTV*SUNDAY/NOROW NOCOL NOPERCENT;
      WEIGHT DOLLAR;
TITLE1 'tab 2 - NON-MODS ADMWIN NIGHT AND SUNDAY PREMIUM COSTS';
TITLE2 'INCLUDE TOTAL 6522 PREMIUM COSTS IDENTIFIED SEPARATELY';
```

Data step 'DATA NMDDIR ;'.

```
PROC FREQ;
  TABLES NIGHT SUNDAY;
  WEIGHT DOLLAR;
 TITLE1 'tab4 - NON-MODS MAIL PROCESSING PREMIUM COSTS';
 TITLE2 'DO NOT INCLUDE ALLOCATED 6522 COSTS   ';
 TITLE3 'COST POOLS INCLUDE FIXED COSTS      ';
```

tab 2 - NON-MODS ADMWIN NIGHT AND SUNDAY PREMIUM COSTS
INCLUDE TOTAL 6522 PREMIUM COSTS IDENTIFIED SEPARATELY

The FREQ Procedure
Table of ACTV by NIGHT

ACTV	NIGHT	
Frequency	1	Total
OTHE	43880	43880
6522	15871	15871
Total	59751.7	59751.7

Table of ACTV by SUNDAY

ACTV	SUNDAY	
Frequency	1	Total
OTHE	1499.8	1499.8
6522	0	0
Total	1499.79	1499.79

tab4 - NON-MODS MAIL PROCESSING PREMIUM COSTS
DO NOT INCLUDE ALLOCATED 6522 COSTS
COST POOLS INCLUDE FIXED COSTS

The FREQ Procedure

NIGHT	Frequency	Percent	Cumulative Frequency	Cumulative Percent
1	559708.5	100.00	559708.5	100.00

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

SUNDAY	Frequency	Percent	Cumulative Frequency	Cumulative Percent
1	21180.73	100.00	21180.73	100.00

2.b) Proportional Re-allocation of activity code '5340' to the Premium distribution keys

The premium tallies for actv=5340 are redistributed proportionately to the 'enhanced carrier' and 'standard mail' Night Pay and Sunday Pay direct tallies by applying to those direct tallies hard-coded 'inflation' factors in the PREMITOT program codes following the comment caption '*.....adjustment for actv=5340.....;' as follows:

```
*.....adjustment for actv=5340.....;
    IF ' 9'<=SUBSTR(DMM,1,2)<='13' AND NIGHT='1'
                  AND PLATF = 'NON-PLA,NON-PREM'
       THEN DOLLAR= DOLLAR*(514360+25529+4814)/(514360+25529);
    IF ' 9'<=SUBSTR(DMM,1,2)<='13' AND NIGHT='1'
                  AND SUBSTR(PLATF,1,8) = 'PLATFORM       '
       THEN DOLLAR= DOLLAR*( 13792+2344+72  )/(13792+2344);


*.....adjustment for actv=5340.....;
   IF ' 9'<=SUBSTR(DMM,1,2)<='13' AND SUNDAY='1'
                  AND PLATF = 'NON-PLA,NON-PREM'
      THEN DOLLAR= DOLLAR*(52878+3733+138)/(52878+3733);
```

The inflation factors are ratios which consist of the direct tallies for 'enhanced carrier,' 'standard mail,' and actv=5340 in the numerator; and the same tallies but without those for actv=5340 in the denominator. The sources for these numbers can be found in Tables V-3C and V-3F generated as follows by the PREMITOT program codes under the comment caption '*.....derive premium distribution keys.....;'

Data step 'DATA OUTX; SET S4;'

```
PROC FREQ FORMCHAR(1,2,7)='    ';
    TABLES  MAIL*PLATF/ NOPERCENT NOROW ;
    WEIGHT DOLLAR;
TITLE1 'TABLE V-3C: NIGHT PAY DISTRIBUTION KEYS - PRC VERSION ';
TITLE2 'NON-BMC MAIL PROCESSING SUBCLASS VOLUME-VARIABLE COSTS';
TITLE3 'BY PLATFORM AND NON-PLATFORM OPERATIONS';
TITLE4 'SUBCLASSES ARE IDENTIFIED IN SEPARATE PREF & NON-PREF';
TITLE5 'COLUMNS FOR NON-PLATFORM OPERATIONS';
TITLE6 'BASED ON PREMIUM DIRECT TALLIES';
TITLE7 'ACTV 5340 UNDISTRIBUTED';
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

Data step 'DATA OUTX; SET S5;'

```
PROC FREQ FORMCHAR(1,2,7)='    ';
  TABLES  MAIL*PLATF / NOPERCENT NOROW ;
  WEIGHT DOLLAR;
TITLE1 'TABLE V-3F: SUNDAY PAY DISTRIBUTION KEYS - PRC VERSION ';
TITLE2 'NON-BMC MAIL PROCESSING SUBCLASS VOLUME-VARIABLE COSTS';
TITLE3 'BY PLATFORM AND NON-PLATFORM OPERATIONS';
TITLE4 'SUBCLASSES ARE IDENTIFIED IN SEPARATE PREF & NON-PREF';
TITLE5 'COLUMNS FOR NON-PLATFORM OPERATIONS';
TITLE6 'BASED ON PREMIUM DIRECT TALLIES';
TITLE7 'ACTV 5340 UNDISTRIBUTED';
```

These codes generate Tables V-3C and V-3F as follows:

TABLE V-3C: NIGHT PAY DISTRIBUTION KEYS - PRC VERSION
NON-BMC MAIL PROCESSING SUBCLASS VOLUME-VARIABLE COSTS
BY PLATFORM AND NON-PLATFORM OPERATIONS
SUBCLASSES ARE IDENTIFIED IN SEPARATE PREF & NON-PREF
COLUMNS FOR NON-PLATFORM OPERATIONS
BASED ON PREMIUM DIRECT TALLIES
ACTV 5340 UNDISTRIBUTED

The FREQ Procedure
Table of MAIL by PLATF

MAIL	PLATF		
Col Pct	NON-PLA	NON-PLA, PREM-544	PLATFORM NON-PREM
			Frequency Total (660)
1--LTRS SGL PC	1335301	0	22451	1357752
		58.96	0.00	30.71
2--LTRS PRESORT	347681	0	6041.4	353722
		15.35	0.00	8.26
3--CARDS SGL PC	57989	0	74.744	58064
		2.56	0.00	0.10
4--CARDS PRSORT	15796	0	147.2	15943
		0.70	0.00	0.20
5--PRIORITY	225044	0	10536	235580
		9.94	0.00	14.41
6--EXPRESS	22563	0	1436.3	23999
		1.00	0.00	1.96
8-1 IN COUNTY	2613.8	0	398.99	3012.8
		0.12	0.00	0.55
8-2 OUT COUNTY	179316	0	6519.9	185836
		7.92	0.00	8.92
10--(A) ENH.CARR	0	43293	2344.2	45637
		0.00	7.03	3.21
11--(A) REGULAR	0	514360	13792	528152
		0.00	83.57	18.87

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

14--(B) PARCELS	0	25529	4073	29602
		0.00	4.15	5.57
15--(B) BD PRINT	0	13766	1317	15083
		0.00	2.24	1.80
16--(B) MEDIA ML	0	13719	959.93	14679
		0.00	2.23	1.31
18--USPS	33240	0	2373.9	35614
		1.47	0.00	3.25
19--FREE MAIL	2996.4	0	74.744	3071.1
		0.13	0.00	0.10
20--INTL MAIL	42300	0	489.1	42789
		1.87	0.00	0.67
5340	0	4814.4	72.46	4886.9
		0.00	0.78	0.10
Total	2264840	615481	73101.7	2953422

TABLE V-3F: SUNDAY PAY DISTRIBUTION KEYS - PRC VERSION
NON-BMC MAIL PROCESSING SUBCLASS VOLUME-VARIABLE COSTS
BY PLATFORM AND NON-PLATFORM OPERATIONS
SUBCLASSES ARE IDENTIFIED IN SEPARATE PREF & NON-PREF
COLUMNS FOR NON-PLATFORM OPERATIONS
BASED ON PREMIUM DIRECT TALLIES
ACTV 5340 UNDISTRIBUTED

The FREQ Procedure
Table of MAIL by PLATF

MAIL	PLATF		
Col Pct	NON-PLA	NON-PLA, PREM-659	PLATFORM NON-PREM	Frequency Total (655)
1--LTRS SGL PC	61161	0	463.86	61624
		50.47	0.00	15.41
2--LTRS PRESORT	23221	0	0	23221
		19.16	0.00	0.00
3--CARDS SGL PC	3324.5	0	0	3324.5
		2.74	0.00	0.00
4--CARDS PRSORT	724.03	0	0	724.03
		0.60	0.00	0.00
5--PRIORITY	7820.1	0	521.08	8341.2
		6.45	0.00	17.31
6--EXPRESS	728.65	0	0	728.65
		0.60	0.00	0.00
8-1 IN COUNTY	93.722	0	315.82	409.55
		0.08	0.00	10.49
8-2 OUT COUNTY	18208	0	216.63	18425
		15.03	0.00	7.20
10--(A) ENH.CARR	0	3733.1	637.21	4370.3
		0.00	6.30	21.17
11--(A) REGULAR	0	52878	699.4	53577
		0.00	89.30	23.24

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 7 (PART 1)

14--(B) PARCELS	0	1317.3	72.46	1389.8
		0.00	2.22	2.41
15--(B) BD PRINT	0	1056.5	0	1056.5
		0.00	1.78	0.00
16--(B) MEDIA ML	0	90.733	0	90.733
		0.00	0.15	0.00
18--USPS	1755.4	0	83.594	1839
		1.45	0.00	2.78
20--INTL MAIL	4141.4	0	0	4141.4
		3.42	0.00	0.00
5340	0	137.76	0	137.76
		0.00	0.23	0.00
Total	121178	59213	3010.06	183401

3) Adjustment for undistributed mixed mail items (Programs NONMOD12, NONMOD22)

Tallies for undistributed mixed mail items (i.e. those with no matching subclass distribution keys within a facility grouping) are re-allocated proportionately to all other distributed item subclasses within the undistributed mixed mail cost pool by applying hard-coded factors within that cost pool in the last data steps of programs NONMOD12 and NONMOD22. The hard-coded factors are pool-specific ratios that consist of all cost pool items which include the undistributed mixed mail items in the numerator, and exclude the undistributed mixed mail items in the denominator, as is shown below.

```
Program NONMOD12
*adjustment for sckoth;
  if pool='ALLIED' then dollar=dollar*20149/(20149-186);
  if pool='MANP  ' then dollar=dollar* 9514/( 9514-111);
  if pool='REGISTRY' then dollar=dollar* 2290/( 2290-902);

Program NONMOD22
dollar=dollar*63312/(63312-227);
```

The following 'proc freq' SAS codes can be added to Program NONMOD12 in the data step 'DATA ITEMPLF ITEM1;' to generate the hard-coded numbers:

```
proc freq data=item1;
  tables type*pool/norow nocol nopercent;
  weight wgt;
  title1 'items to be filled - exclude containers in allied cost pool';
proc freq data=itemplf;
  tables type;
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

```
weight wgt;
title1 'items to be filled - only containers in allied cost pool';
footnote 'NonMODs Fy 04 PRC';
```

The 'proc freq' codes will produce the following tables:

Items to be filled - exclude containers in allied cost pool

Frequency	ALLIED	AUTO/MEC	MANF	MANL	MANP	MISC	REGISTRY	Total
BUNDLE	191.97	657.9	2916.6	436.89	502.73	292.06	0	4998.1
CONCON	87.906	104.34	288.64	151.47	0	0	103.94	736.3
OTHR_I	953.19	132.86	303.3	178.25	0	127.98	0	1695.6
PALLET	1419.4	148.86	295.97	0	175.36	0	0	2039.6
PC_CRD	0	0	0	65.5	0	39.4	0	104.9
PC_FLT	0	104.32	3263.3	210.49	79.057	290.11	36.857	3984.2
PC_IPP	0	0	99.323	9.8968	672.98	0	14.743	796.94
PC_LTR	0	274.91	533.31	931.15	0	654.95	36.857	2431.2
PC_PCL	0	53.241	268.56	339.37	5227.1	492.63	97.851	6478.7
SCKB_O	297.42	0	0	0	0	0	87.906	385.33
SCKBWN	814.68	0	152.08	0	0	0	0	966.76
SCKGRN	137.15	0	0	19.291	175.36	0	103.94	435.74
SCKO_Y	1443.9	0	0	0	325.77	0	0	1769.7
SCKOTH	**186.34**	**0**	**0**	**0**	**111.08**	**0**	**901.73**	1199.2
SCKWH1	858.92	0	0	0	799.68	0	96.165	1754.8
SCKWH2	1439.9	0	1228.2	762.09	247.75	0	380.65	4058.6
SCKWH3	1059.7	0	0	0	0	396.37	0	1456.1
TRAY_F	7275.8	1236	12935	1792.4	494.05	2332.3	126.43	26192
TRAY_L	3982.6	16174	675.86	14000	432.18	1782.8	302.79	37350
TRAY_P	0	0	190.72	73.714	270.57	239.63	0	774.63
Total	**20149**	18886	23151.1	18970.3	**9513.66**	6648.22	**2289.86**	99608.1

Items to be filled - only containers in allied cost pool.

TYPE	Frequency	Percent	Cumulative Frequency	Cumulative Percent
BUNDLE	7331.782	11.58	7331.8	11.58
CONCON	4.808265	0.01	7336.6	11.59
OTHR_I	725.4833	1.15	8062.1	12.73
PALLET	185.6232	0.29	8247.7	13.03
PC_CRD	409.1263	0.65	8656.8	13.67
PC_FLT	4067.708	6.42	12725	20.1
PC_IPP	902.4422	1.43	13627	21.52
PC_LTR	8597.198	13.58	22224	35.1
PC_PCL	9239.266	14.59	31463	49.7
SCKB_O	396.8221	0.63	31860	50.32
SCKBWN	171.1013	0.27	32031	50.59
SCKGRN	534.2631	0.84	32566	51.44
SCKO_Y	700.0434	1.11	33266	52.54
SCKOTH	**226.6885**	0.36	33492	52.9

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 7 (PART 1)

SCKWH1	962.3721	1.52	34455	54.42
SCKWH2	354.6935	0.56	34809	54.98
SCKWH3	36.98365	0.06	34846	55.04
TRAY_F	15121.38	23.88	49968	78.92
TRAY_L	12546.61	19.82	62514	98.74
TRAY_P	797.3541	1.26	63312	100

4) Hard-Coded Data for MODS Cost Pools (DOLWGT)

DOLWGT contains hard-coded data for DOLLARS and IOCDOL as follows:

```
*..... Mail Processing Cost Pools - BY 04 ..................;


   IF POOL = 'BCS/     ' THEN DO;V='11';
           space='902';
           dollars =  158403; iocdol =  150688; END;
   IF POOL = 'BCS/DBCS' THEN DO;V='11';
           space='901';
           dollars = 1272441; iocdol = 1264499; END;
   IF POOL = 'OCR/     ' THEN DO;V='11';
           space='903';
           dollars =  211011; iocdol =  217357; END;
   IF POOL = 'AFSM100  ' THEN DO;V='12';
           space='906';
           dollars =  546840; iocdol =  518355; END;
   IF POOL = 'FSM/     ' THEN DO;V='12';
           space='904';
           dollars =    3520; iocdol =    7889; END;
   IF POOL = 'FSM/1000' THEN DO;V='12';
           space='905';
           dollars =  230941; iocdol =  225263; END;
   IF POOL = 'MPLSM    ' THEN DO;V='13';
           space='907';
           dollars =       0; iocdol =     129; END;
   IF POOL = 'MECPARC  ' THEN DO;V='13';
           space='909';
           dollars =    7098; iocdol =    8576; END;
   IF POOL = 'SPBS OTH' THEN DO;V='13';
           space='910';
           dollars =  427110; iocdol =  426323; END;
   IF POOL = 'SPBSPRIO' THEN DO;V='13';
           space='910';
           dollars =   95150; iocdol =   98173; END;
   IF POOL = '1SACKS_M' THEN DO;V='13';
           space='908';
           dollars =   30355; iocdol =   29339; END;
   IF POOL = '1TRAYSRT' THEN DO;V='13';
           space='971';
           dollars =  139652; iocdol =  129018; END;
   IF POOL = 'MANF     ' THEN DO;V='14';
           space='911';
           dollars =  246898; iocdol =  259436; END;
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

```
IF POOL = 'MANL     ' THEN DO;V='14';
        space='912';
        dollars =  962846; iocdol =  969937; END;
IF POOL = 'MANP     ' THEN DO;V='14';
        space='913';
        dollars =   77846; iocdol =   77119; END;
IF POOL = 'PRIORITY' THEN DO;V='14';
        space='914';
        dollars =  232857; iocdol =  212848; END;
IF POOL = 'LD15     ' THEN DO;V='15';
        space='915';
        dollars =  178217; iocdol =   21229; END;
IF POOL = '1CANCEL ' THEN DO;V='17';
        space='918';
        dollars =  299092; iocdol =  311602; END;
IF POOL = '1DSPATCH' THEN DO;V='17';
        space='973';
        dollars =  218321; iocdol =  215677; END;
IF POOL = '1FLATPRP' THEN DO;V='17';
        space='974';
        dollars =  282739; iocdol =  259967; END;

IF POOL = '1MTRPREP' THEN DO;V='17';
        space='918';
        dollars =   32263; iocdol =   31251; END;
IF POOL = '1OPBULK ' THEN DO;V='17';
        space='921';
        dollars =  228247; iocdol =  208425; END;
IF POOL = '1OPPREF ' THEN DO;V='17';
        space='920';
        dollars =  562762; iocdol =  502158; END;
IF POOL = '1OPTRANS' THEN DO;V='17';
        space='    '; *dont need for space cost dist;
        dollars =  130816; iocdol =  126965; END;
IF POOL = '1PLATFRM' THEN DO;V='17';
        space='922';
        dollars = 1351900; iocdol = 1360394; END;
IF POOL = '1POUCHNG' THEN DO;V='17';
        space='923';
        dollars =  138268; iocdol =  130587; END;
IF POOL = '1PRESORT' THEN DO;V='17';
        space='917';
        dollars =   12669; iocdol =   69166; END;
IF POOL = '1SACKS_H' THEN DO;V='17';
        space='919';
        dollars =  128372; iocdol =  126175; END;
if POOL = '1SCAN    ' THEN DO;V='17';
        space='916';
        dollars =   83753; iocdol =   96165; END;
IF POOL = '1SWYB    ' THEN DO;V='17';
        space='972'; * merged with scan in 2004;
        dollars =       0; iocdol =      0.1; END;
IF POOL = 'BUSREPLY' THEN DO;V='18';
        space='924';
        dollars =   36101; iocdol =   44343; END;
IF POOL = 'EXPRESS ' THEN DO;V='18';
        space='928';
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 7 (PART 1)

```
        dollars =  100914; iocdol =  105077; END;
IF POOL = 'MAILGRAM' THEN DO;V='18';
        space='   ';
        dollars =    3520; iocdol =    3626; END;
IF POOL = 'REGISTRY' THEN DO;V='18';
        space='930';
        dollars =  151234; iocdol =  177918; END;
IF POOL = 'REWRAP  ' THEN DO;V='18';
        space='925';
        dollars =   22223; iocdol =   24676; END;
IF POOL = '1EEQMT  ' THEN DO;V='18';
        space='926';
        dollars =   30848; iocdol =   31210; END;
IF POOL = '1MISC   ' THEN DO;V='18';
        space='929';
        dollars =  231961; iocdol =  227345; END;
IF POOL = '1SUPPORT' THEN DO;V='18';
        space='929';
        dollars =  277680; iocdol =  280376; END;
IF POOL = 'INTL ISC' THEN DO;V='19';
        space='931';
        dollars =  165161; iocdol =  171531; END;
IF POOL = 'PMPC    ' THEN DO;V='19';
        space='927';
        dollars =  137898; iocdol =  168242; END;
IF POOL = 'LD41    ' THEN DO;V='41';
        space='932';
        dollars =   23465; iocdol =   33178; END;
IF POOL = 'LD42    ' THEN DO;V='42';
        space='933';
        dollars =     435; iocdol =    3429; END;
IF POOL = 'LD43    ' THEN DO;V='43';
        space='934';
        dollars =  684154; iocdol =  725113; END;
IF POOL = 'LD44    ' THEN DO;V='44';
        space='934';
        dollars =  156310; iocdol =  181307; END;
IF POOL = 'LD48 EXP' THEN DO;V='48';
        space='935';
        dollars =   11267; iocdol =   16407; END;
IF POOL = 'LD48 OTH' THEN DO;V='48';
        space='936';
        dollars =  183954; iocdol =  236540; END;
IF POOL = 'LD48_ADM' THEN DO;V='48';
        space='936';
        dollars =  308946; iocdol =  187497; END;
IF POOL = 'LD48_SSV' THEN DO;V='48';
        space='937';
        dollars =   84702; iocdol =   99433; END;
IF POOL = 'LD49    ' THEN DO;V='49';
        space='938';
        dollars =  293973; iocdol =  348710; END;
IF POOL = 'LD79    ' THEN DO;V='79';
        space='939';
        dollars =  184307; iocdol =  139938; END;

  factor = dollars/iocdol;
```

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO POIR NO. 7, QUESTION 7 (PART 1)

```
*.....Administrative and window Services - FY 04 ............;

IF substr(POOL,1,4) = '2ADM' THEN DO;
       funccost =  445323; iocdol = 509885 ; END;
IF substr(POOL,1,4) = '2WIN' THEN DO;
       funccost =  843399; iocdol =  911080; END;
IF pool = '2ADM INQ' THEN DO;
       funccost =  16662 ; iocdol =   9933 ; END;
IF pool = '2ADM ISC' THEN DO;
       funccost =   7850 ; iocdol =  11402 ; END;
IF pool = '2ADM PMP' THEN DO;
       funccost =   2227 ; iocdol =   4962 ; END;
IF pool = '2ADM_OUT' THEN DO;
       funccost =      0 ; iocdol =  81770 ; END;
```

The following 'proc freq' SAS codes can be added to Program 'MOD1POOL' in the data step 'DATA OUT1.MODS;' to generate the hard-coded numbers for 'IOCDOL':

```
PROC FREQ data=out1.mods;
 TABLES COSTPOOL;
 WEIGHT WGT;
 TITLE1 'COST POOLS - IOCS $';
```

The table obtained from the above 'proc freq' is listed below

COST POOLS - IOCS $
The FREQ Procedure

COSTPOOL	Frequency	Percent	Cumulative Frequency	Cumulative Percent
2ADM	509884.9	3.99	509884.9	3.99
2ADM INQ	9933.151	0.08	519818	4.06
2ADM ISC	11401.77	0.09	531219.8	4.15
2ADM PMP	4962.265	0.04	536182	4.19
2ADM_OUT	81769.57	0.64	617951.6	4.83
11 BCS/	150687.9	1.18	768639.5	6.01
11 BCS/DBCS	1264499	9.89	2033138	15.90
11 OCR/	217356.7	1.70	2250495	17.60
12 AFSM100	518354.7	4.05	2768850	21.65
12 FSM/	7888.914	0.06	2776739	21.71
12 FSM/1000	225263.5	1.76	3002002	23.47
13 MECPARC	8575.733	0.07	3010578	23.54
13 MPLSM	128.9266	0.00	3010707	23.54
13 SPBS OTH	426323	3.33	3437030	26.87
13 SPBSPRIO	98172.87	0.77	3535203	27.64
13 1SACKS_M	29338.99	0.23	3564542	27.87
13 1TRAYSRT	129017.9	1.01	3693560	28.88
14 MANF	259435.8	2.03	3952995	30.91
14 MANL	969937.3	7.58	4922933	38.49
14 MANP	77119.04	0.60	5000052	39.09
14 PRIORITY	212848	1.66	5212900	40.76
15 LD15	21229.17	0.17	5234129	40.92

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 7 (PART 1)

17	1CANCEL	311602.1	2.44	5545731	43.36
17	1DSPATCH	215677.2	1.69	5761408	45.05
17	1FLATPRP	259967.3	2.03	6021375	47.08
17	1MTRPREP	31250.84	0.24	6052626	47.32
17	1OPBULK	208424.8	1.63	6261051	48.95
17	1OPPREF	502158.1	3.93	6763209	52.88
17	1OPTRANS	126964.9	0.99	6890174	53.87
17	1PLATFRM	1360394	10.64	8250568	64.51
17	1POUCHNG	130586.7	1.02	8381155	65.53
17	1PRESORT	69166.13	0.54	8450321	66.07
17	1SACKS_H	126175	0.99	8576496	67.06
17	1SCAN	96164.56	0.75	8672660	67.81
18	BUSREPLY	44342.61	0.35	8717003	68.16
18	EXPRESS	105076.9	0.82	8822080	68.98
18	MAILGRAM	3625.743	0.03	8825706	69.01
18	REGISTRY	177918.5	1.39	9003624	70.40
18	REWRAP	24676.03	0.19	9028300	70.59
18	1EEQMT	31210.41	0.24	9059511	70.83
18	1MISC	227345.5	1.78	9286856	72.61
18	1SUPPORT	280375.8	2.19	9567232	74.80
19	INTL ISC	171531.3	1.34	9738763	76.15
19	PMPC	168241.7	1.32	9907005	77.46
41	LD41	33178.5	0.26	9940184	77.72
42	LD42	3429.255	0.03	9943613	77.75
43	LD43	725113.3	5.67	10668726	83.42
44	LD44	181307.3	1.42	10850033	84.83
45	2WINDOW	911079.9	7.12	11761113	91.96
48	LD48 EXP	16407	0.13	11777520	92.09
48	LD48 OTH	236540.5	1.85	12014061	93.94
48	LD48_ADM	187496.5	1.47	12201557	95.40
48	LD48_SSV	99433.27	0.78	12300991	96.18
49	LD49	348710.2	2.73	12649701	98.91
79	LD79	139937.9	1.09	12789639	100.00

The values for the cost pool DOLLARS in the PRC version of DOLWGT are the same as those for the USPS version of DOLWGT (see Part I of LR-K-55, Tables I-2, I-2i, I-2A and I-2B), except for the individual cost pools in LDC 48.

The tables listed below provides information on the individual LDC 48 cost pools corresponding to Tables I-2, I-2A and I-2B which serve as inputs into DOLLARS.

Table I-2

---------- ldc=48-CS/Op- Misc/Ins,COD ----------

pool	amtjvadj	LDCpct	poolcost
LD48 EXP	588,869,311	0.019134702	11,267,839
LD48 OTH	588,869,311	0.312384439	183,953,609
LD48_ADM	588,869,311	0.524642551	308,945,898
LD48_SSV	588,869,311	0.143838308	84,701,965

Table I-2A

ldc	pool	poolhrs	ldchrs	LDCpct

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 7, QUESTION 7 (PART 1)

48-CS/Op- Misc/Ins,COD	LD48 EXP	50,767	2,653,133	0.019134702
48-CS/Op- Misc/Ins,COD	LD48 OTH	28,797	2,653,133	0.312384439
48-CS/Op- Misc/Ins,COD	LD48_ADM	1,391,946	2,653,133	0.524642551
48-CS/Op- Misc/Ins,COD	LD48_SSV	381,622	2,653,133	0.143838308

Table I-2B

ldc=48 pool=LD48 EXP

mod	modname	modhrs
583	EXPRESS MAIL - CUSTOMER SERVICE	50766.91

ldc=48 pool=LD48 OTH

mod	modname	modhrs
065	SCANNING OPERATIONS	4986.19
741	MISC ACTIVITY - DELIVERY SERVICES	91124.65
742	MISC ACTIVITY - CUSTOMER SERVICES	552628.09
794	MISC MARKUP ACTIV - STATION/BRANCH	180058.53
pool		828797.46

ldc=48 pool=LD48_ADM

mod	modname	modhrs
353	STANDBY-CUSTOMER SERVICES	6529.27
558	OFFICE WORK & RECORDS-CUST SVCS	659720.38
559	OFFICE WORK & RECORDS-DELIVERY SVCS	119627.74
608	STEWARDS - CLERKS - CUSTOMER SRVC	23807.79
621	TRAVEL-CUSTOMER SERVICES	26275.54
631	MEETING TIME - CUSTOMER SERVICES	2638.75
678	ADMIN & CLERICAL-AREA STATIONS	41117.82
756	TACS FUNCTION 2/4 OPERATION DEFAULT	512229.17
pool		1391946.46

ldc=48 pool=LD48_SSV

mod	modname	modhrs
542	INSURED - COD - CUSTOMS	7757.76
543	INSURED - COD - CUSTOMS	9787.39
544	CAGES SERVING CARRIERS/SPC DELIVERY	364077.01
pool		381622.16
ldc		2653132.99

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 8, QUESTION 11

11. Please refer to the document Notice of United States Postal Service of Replacement of Witness Moser, filed on May 20, 2005. The document states that witness Moser is withdrawing from the case and that her testimony will be divided between several other witnesses. The document states that witness Hatcher will incorporate numerous sections of witness Moser's testimony into her testimony, one of which is section XI (Periodicals Applications). However, in witness Hatcher's revised testimony filed on June 8, 2005 there is no mention or coverage of Periodicals Applications. Please explain when this topic will be covered and which witness will be covering it.

RESPONSE:

Costs for Periodicals applications are covered by witness Page. See Notice of United States Postal Service of Filing of Revised Testimony of Witness Page (USPS-T-23), filed June 22, 2005.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO POIR NO. 8, QUESTION 15

15. Please provide Billing Determinants for FY 2003 for Parcel Post, Priority, and Express mail.

RESPONSE:

The FY 2003 Billing Determinants for Express Mail, Priority Mail, and Parcel Post are provided in library reference K-144.

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF TIME WARNER, INC

TW/USPS-T11-1 In section B.1 of your testimony you describe various changes, between BY2000 and BY2004, in the configuration of cost pools used to distribute mail processing costs.

a. Please state, for each change in cost pool configuration, in which of the intervening fiscal years (FY2001 through FY2003) the given change was used in producing the CRA reports for that year.

b. Please refer to spreadsheet r2005 lr-k-100 pt_2.xls in LR-K-100 and confirm that the use of additional cost pools within LDC 17 is reflected also in the version of "PRC costing" that the Postal Service has presented in the current rate filing. If not confirmed, please explain.

c. Please refer to spreadsheet r2005 lr-k-100 pt_2.xls in LR-K-100 and confirm that the combining of certain Function 4 cost pools (e.g., LD4x) with Non-MODS cost pools is not reflected in the version of "PRC costing" that the Postal Service has presented in the current rate filing. If not confirmed, please explain.

d. Please describe which other cost pool reconfigurations between BY2000 and BY2004 are reflected also in the version of "PRC costing" that the Postal Service has presented in the current rate filing.

e. Please explain fully the rationale behind the inclusion of some but not all of the proposed pool reconfigurations in the version of "PRC costing" that the Postal Service has presented in the current rate filing.

RESPONSE:

e. Cost pool updates or reconfigurations that would be implemented in both the USPS and the PRC versions are those driven by changes in the operational environment and/or in the definition of MODS operation codes. Such changes in turn are reflected in the MODS operation codes reported through IOCS. In such cases, failing to update the cost pool definitions in the PRC version would lead to

an erroneous partition of clerk and mail handler costs into cost pools which does not account for operational changes. Examples are the introduction of new technologies such as the AFSM 100 or Tray sorters/Robotics (1TRAYSRT), the redefinition of MODS operations as in the implementation of standardized MODS LDC 17 (allied labor) work center definitions, or the addition of specialized facilities as with the conversion of the PMPC network to Postal Service facilities.

In contrast, combining the MODS Function 4 cost pools with non-MODS cost pools is not driven by a change in the operational environment, and may be construed as a departure from current methodology where the Commission's acceptance cannot be assumed.

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF TIME WARNER, INC

TW/USPS-T11-2 Please refer to Table 3 in the attachment to your testimony, which provides BY2004 volume variable mail processing costs by cost pool and subclass/service category. Does the present filing include an equivalent (except for differences in cost pool configuration) table of processing costs by cost pool and subclass/service category under the PRC costing method? If yes, please point out where it has been filed. If no, please provide such a table, in Excel spreadsheet format.

RESPONSE:

To the extent that the PRC mail processing costs are generated by cost pool and subclass/service category and do not include additional adjustment from the PRC B Workpapers, there is an equivalent (except for differences in cost pool configuration) table under the PRC method filed as a zipped Excel spreadsheet in the attached diskette of R2005 LR-K-100 under pt_2. The Excel spreadsheet consists of three worksheets labeled Tables II a, b, c. The rows associated with the numeric IOCS activity codes in column A of Tables II a-c represent the "migrated" and "fixed" tallies both of which are not included in the mail processing costs. Please note that 'clocking in and out' costs for the BMCs and the non-MODs subclass costs are not included by cost pool in Tables II b-c but are distributed by facility in the PRC B Workpapers WS 3.1.1a. Also note that the subclass costs for all three tables do not include the Registry adjustment that is not computed by cost pool but is applied to the total mail processing costs in the PRC B Workpapers WS 3.1.1.

RESPONSES OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF TIME WARNER, INC

TW/USPS-T11-3 For each table in the attachment to your testimony, please provide, in Excel spreadsheet form, equivalent tables corresponding to the CRA for:

a. FY2003;

b. FY2002; and

c. FY2001.

RESPONSE:

a-b. Please see the attached tables. The response to "c." is forthcoming.

Table 1: FY 03 Cost Segment 3 Clerk and Mailhandler Cost Pools

A. MAIL PROCESSING - PLANTS GROUP 1/

SAS name		Cost Pool Title	Pool Total Costs	Pool Volume-Variable Factor	Pool Volume-Variable Cost
		Automated Equipment			
BCS/	1	BCS - Other than CBCS/DBCS*	177,798	0.73	129,793
BCS/DBCS	2	CBCS / DBCS*	1,194,807	0.89	1,063,378
OCR/	3	OCR*	237,787	0.87	206,875
		Mechanized, Letters & Flats			
AFSM100	4	AFSM100 - LDC 12 (incl. LDC 15 VCS Flat keying)*	578,743	0.97	561,381
FSM/	5	*FSM - Other than FSM 1000 & AFSM100**	*24,661*	*0.97*	*23,921*
FSM/1000	6	FSM 1000*	254,647	0.76	193,532
		Mechanized, Other			
MPLSM		LSM,MPLSM & SPLSM W/BCR	245	0.90	221
MECPARC	7	Mechanized Parcels	8,940	0.82	7,331
SPBS OTH	8	SPBS - Non Priority*	418,182	0.73	305,273
SPBSPRIO	9	SPBS - Priority*	99,284	0.73	72,477
1SACKS_M	10	Mechanical Sort - Sack Outside	36,847	0.82	30,215
1TRAYSRT	11	Mechanical Tray Sorter	80,319	0.82	65,862
		Manual Operations			
MANF	12	Manual Flats*	259,602	0.87	225,854
MANL	13	Manual Letters*	1,027,932	0.77	791,508
MANP	14	Manual Parcels*	81,142	0.80	64,914
PRIORITY	15	Manual Priority*	230,422	0.61	140,557
LD15	16	**LDC 15 - RBCS***	197,236	1.00	197,236
		Allied Operations			
1CANCEL	17	Cancellation*	292,604	0.72	210,675
1DSPATCH	18	Dispatch	224,742	0.82	184,288
1FLATPRP	19	Flats Preparation	252,038	0.82	206,671
1MTRPREP	20	Mail Preparation - metered*	35,271	0.70	24,690
1OPBULK	21	Opening Unit - BBM	227,858	0.82	186,844
1OPPREF	22	Opening Unit - Preferred Mail	548,214	0.82	449,535
1OPTRANS	23	Opening - Manual transport	112,136	0.82	91,952
1PLATFRM	24	Platform	1,288,351	0.82	1,056,448
1POUCHNG	25	Pouching Operations	136,051	0.82	111,562
1PRESORT	26	Presort	14,425	0.82	11,829
1SACKS_H	27	Manual Sort - Sack Outside	136,981	0.82	112,324
1SCAN	28	Air Contract DCS and Incoming/SWYB	38,415	0.82	31,500
1SWYB		Scan Where You band	52,600	0.82	43,132
		Other Operations			
BUSREPLY	29	Business Reply / Postage Due	36,859	0.82	30,224
EXPRESS	30	Express Mail	99,313	0.82	81,437
MAILGRAM	31	Mailgram	81	0.82	66
REGISTRY	32	Registry **	151,073	0.39	58,918
REWRAP	33	Damaged Parcel Rewrap	17,035	0.82	13,969
1EEQMT	34	Empty Equipment	29,629	0.82	24,296
1MISC	35	Miscellaneous Activity 2/	183,951	0.82	150,840
1SUPPORT	36	Mail Processing Support 2/	222,033	0.82	182,067
LD49	37	LDC 49 - Computerized Forwarding Syst.	275,575	0.82	225,972
LD79	38	LDC 79 - Mailing Req' & Bus. Mail Entry	169,599	0.82	139,071
INTL ISC	39	**ISCs (International Service Centers)**	162,246	0.82	133,042
PMPC	40	**PMPCs (Priority Mail Processing Centers)**	128,923	0.82	105,717
		MAIL PROCESSING TOTAL FOR PLANTS	**9,744,597**	**0.82**	**7,947,393**

Footnotes
* Econometrically derived volume-variability factors
** Volume-variable fraction is based on IOCS classification of 'fixed' activities in the cost poo
1/ This group includes PMPCS, ISCs, LDC 11-15, 17-18, 49,79 for MODS 1&2 Facilities
2/ These support cost pools are combined into the piggyback cost pool 1SUPP_F

Table 1: FY 03 Cost Segment 3 Clerk and Mailhandler Cost Pools

SAS name		Cost Pool Title	Pool Total Costs	Pool Volume-Variable Factor	Pool Volume-Variable Cost
		B. MAIL PROCESSING - POST-OFFICES, STATIONS & BRANCHES GROUP 1/			
ALLIED	41	Allied	951,809	0.82	780,483
AUTO/MECH	42	Automated/Mechanized	232,553	0.82	190,693
EXPRESS	43	Express Mail			
EXPRS IN		Express - In-Office Activities	10,430	0.82	8,553
EXPRS OUT		Express - Out-Of-Office Activities 3/	11,771	0.43	5,061
MANF	44	Manual Flat	609,922	0.82	500,136
MANL	45	Manual Letter	941,466	0.82	772,002
MANP	46	Manual Parcel	338,119	0.82	277,257
MISC	47	Miscellaneous	591,615	0.82	485,124
REGISTRY	48	Registry 4/	67,027	0.35	23,460
		MAIL PROC.TOTAL FOR P.O. STA/BRs 2/	**3,754,712**	**0.81**	**3,042,770**
		C. MAIL PROCESSING - BMCs GROUP			
NMO	49	Non-Machinable Outside (NMO)	39,936	0.82	32,747
OTHR	50	Allied Labor & all other Mail Processing	329,332	0.82	270,052
PLA	51	Platform	223,456	0.82	183,234
PSM	52	Parcel Sorting Machine	74,436	0.82	61,037
SPB	53	SPBS & Irregular Parcels (IPP & 115)	70,754	0.82	58,018
SSM	54	Sack Sorting Machine	28,833	0.82	23,643
		MAIL PROCESSING TOTAL FOR BMCs 2/	**766,745**	0.82	**628,731**
		TOTAL MAIL PROCESSING FOR COST SEGMENT 3	***14,266,054***	***0.81***	***11,618,894***
		D. ADMINISTRATIVE AND WINDOW SERVICES			
		MODS 1&2 Facilities			
		LDC 45 - Window Service	799,962		
		Claims & Inquiries	17,021		
		Administrative Services 5/	658,728		
			1,475,711		
		Post-Offices, Stations & Branches			
		Window Service	1,593,239		
		Claims & Inquiries	25,911		
		Administrative Services	637,270		
			2,256,420		
		BMCs			
		Window Service	877		
		Claims & Inquiries	1,844		
		Administrative Services	73,804		
			76,525		
		TOTAL ADMINISTRATIVE & WINDOW SERVICES FOR C/S 3	***3,808,656***		
		TOTAL CLERK AND MAILHANDLER COSTS FOR COST SEGMENT 3	**18,074,710**		

Footnotes

1/ This group includes NONMODS Facilities plus MODS LDC41-44 48 as follows:

LDC 41 - Unit Distribution - Automated	26,166
LDC 42 - Unit Distribution - Mechanized	858
LDC 43 - Unit Distribution - Manual	653,539
LDC 44 - Post-Office Box Distribution	154,431
LDC 48 - Customer Service / Express	495,194
Subtotal MODS 1&2 LDC 41-44, 48	1,330,188
NON-MODS Facilities	4,680,945
POST-OFFCES, STATIONS AND BRANCHES TOTAL	6,011,133

2/ The mail processing cost pools include their portion of the clocking in/out (actv=6522) costs

3/ The volume-variability factor is the one from what used to be C/S 3.4

4/ The volume-variable fraction is based on IOCS classification of 'fixed' activities

5/ The non-mail processing portion of the clocking in/out costs are included in the Administrative Services

Table 2: Proportion of Dollar-Weighted Tallies (Adjusted to the Cost Pool) by Handling ("direct" and "mixed") and Not-Handling Categories for Plants, Post-Offfices, Stations, and Branches, and BMCs

Tally Category	Percentage of Dollar-Weighted Tallies			
	BMCs	**Plants**	**Post-Offices STAs & BRs**	**Total**
Direct Tallies				
Pieces	20.08%	26.64%	43.59%	30.70%
Items	9.60%	11.39%	11.18%	11.24%
Containers	0.86%	0.41%	0.23%	0.38%
Total Direct	30.54%	38.44%	55.00%	42.32%
Mixed Tallies				
Mixed Item Tallies				
Uncounted Item	1.13%	0.50%	0.21%	0.46%
Empty Item	3.23%	2.85%	1.80%	2.60%
Total Item	4.36%	3.35%	2.01%	3.06%
Mixed Container Tallies				
Identified Container				
Loose Pieces	3.74%	1.48%	1.51%	1.61%
Items	3.31%	4.86%	2.85%	4.25%
Subtotal	7.05%	6.34%	4.36%	5.86%
Unidentified Container	3.81%	0.88%	0.61%	0.96%
Empty Container	6.66%	5.06%	3.92%	4.85%
Total Container	17.52%	12.28%	8.89%	11.67%
Total Mixed	21.88%	15.63%	10.90%	14.73%
Not-Handling Tallies	47.58%	45.93%	34.10%	42.95%
TOTAL	100.00%	100.00%	100.00%	100.00%

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Costpool

Mail class	MODS 11 BCS/	MODS 11 BCS/DBCS	MODS 11 OCR/	MODS 12 AFSM100	MODS 12 FSM/	MODS 12 FSM/1000	MODS 13 MECPARC
1--Letters - Single Piece							
Vol-Var Costs	60628	493270	122903	212918	7903.2	86109	1061.9
Col. Pct	46.71	46.39	59.41	37.93	33.04	44.49	14.49
2--Letters - Presort							
Vol-Var Costs	27549	272183	32771	32542	1023.2	11435	123.21
Col. Pct	21.23	25.6	15.84	5.8	4.28	5.91	1.68
3--Cards - Single Piece							
Vol-Var Costs	1012	14949	5074	478.15	139.68	2.8181	5.7124
Col. Pct	0.78	1.41	2.45	0.09	0.58	0	0.08
4--Cards - Presort							
Vol-Var Costs	770.7	5757.3	1877.9	113.07	0.3418	79.431	3.1014
Col. Pct	0.59	0.54	0.91	0.02	0	0.04	0.04
5--Priority Mail							
Vol-Var Costs	45.902	666.79	194.58	5183	430.64	3476.6	2205.6
Col. Pct	0.04	0.06	0.09	0.92	1.8	1.8	30.09
6--*Express Mail*							
Vol-Var Costs	139.17	90.579	126.08	118.1	64.669	92.146	6.3766
Col. Pct	0.11	0.01	0.06	0.02	0.27	0.05	0.09
8-1 Periodicals-InCounty							
Vol-Var Costs	0.4933	2.0833	1.0949	366.96	1.0546	135.41	10.514
Col. Pct	0	0	0	0.07	0	0.07	0.14
8-2 Periodicals-OutsideC							
Vol-Var Costs	687.06	1379.5	394.16	58551	1930.7	24783	689.16
Col. Pct	0.53	0.13	0.19	10.43	8.07	12.81	9.4
10--Standard - ECR							
Vol-Var Costs	1522.6	9992.2	1626.2	10399	1040.2	2900	363.02
Col. Pct	1.17	0.94	0.79	1.85	4.35	1.5	4.95
11--Standard - Regular							
Vol-Var Costs	36221	257960	35903	228918	10320	58287	1389
Col. Pct	27.91	24.26	17.36	40.78	43.14	30.12	18.95
14--Packg S - Parcels							
Vol-Var Costs	6.1027	201.02	112.02	17.557	2.2838	4.7224	671.82
Col. Pct	0	0.02	0.05	0	0.01	0	9.16
15--Packg S-Bound Print							
Vol-Var Costs	5.8004	303.56	151.66	2623.3	2.7089	1098.3	390.7
Col. Pct	0	0.03	0.07	0.47	0.01	0.57	5.33
16--Packg S-Media Mail							
Vol-Var Costs	8.9476	6.8351	27.43	1465.2	368.15	193.74	374.27
Col. Pct	0.01	0	0.01	0.26	1.54	0.1	5.11
18--USPS							
Vol-Var Costs	392.31	3136.8	2205	3074.2	106.12	2406.2	8.887
Col. Pct	0.3	0.29	1.07	0.55	0.44	1.24	0.12
19--Free Mail							
Vol-Var Costs	176.83	101.99	90.441	231.56	0.9875	631.48	0.98
Col. Pct	0.14	0.01	0.04	0.04	0	0.33	0.01
20--International Mail							
Vol-Var Costs	509.38	2708.7	3133.5	4220	584.64	1811.9	23.977
Col. Pct	0.39	0.25	1.51	0.75	2.44	0.94	0.33

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class		*Costpool* MODS 11 BCS/	MODS 11 BCS/DBCS	MODS 11 OCR/	MODS 12 AFSM100	MODS 12 FSM/	MODS 12 FSM/1000	MODS 13 MECPARC
21--Registered Mail								
	Vol-Var Costs	17.298	149.65	23.287	56.508	2.3429	3.2439	2.0543
	Col. Pct	0.01	0.01	0.01	0.01	0.01	0	0.03
22--Certified Mail								
	Vol-Var Costs	0	0.0821	0.0417	0	0.1295	0	0.0154
	Col. Pct	0	0	0	0	0	0	0
23--Insured Mail								
	Vol-Var Costs	0	0.013	0.0066	0	0.0205	0	0.0081
	Col. Pct	0	0	0	0	0	0	0
25--Special Handling								
	Vol-Var Costs	0	184.67	0.0018	0.6605	0.0173	82.211	0.0584
	Col. Pct	0	0.02	0	0	0	0.04	0
27--Other Spec. Services								
	Vol-Var Costs	99.964	333.83	260.26	104.97	0.1062	0	0.2186
	Col. Pct	0.08	0.03	0.13	0.02	0	0	0
Total		129793	1063378	206875	561381	23921	193532	7330.67

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

	Costpool					
Mail class	MODS 13 MPLSM	MODS 13 SPBS OTH	MODS 13 SPBSPRIO	MODS 13 1SACKS_M	MODS 13 1TRAYSRT	MODS 14 MANF
1--Letters - Single Piece						
Vol-Var Costs	110.22	69695	11013	2888.4	19721	99186
Col. Pct	50	22.83	15.19	9.56	29.94	43.92
2--Letters - Presort						
Vol-Var Costs	110.22	3188.6	1697.8	1588.8	20418	13172
Col. Pct	50	1.04	2.34	5.26	31	5.83
3--Cards - Single Piece						
Vol-Var Costs	0	878.75	100.25	21.938	622.19	303.66
Col. Pct	0	0.29	0.14	0.07	0.94	0.13
4--Cards - Presort						
Vol-Var Costs	0	79.569	1.0267	2.4119	606.57	254.2
Col. Pct	0	0.03	0	0.01	0.92	0.11
5--Priority Mail						
Vol-Var Costs	0	14273	46300	3131.1	387.87	6266.6
Col. Pct	0	4.68	63.88	10.36	0.59	2.77
6--Express Mail						
Vol-Var Costs	0	269.83	80.391	19.39	11.687	416.75
Col. Pct	0	0.09	0.11	0.06	0.02	0.18
8-1 Periodicals-InCounty						
Vol-Var Costs	0	144.89	1.8329	31.764	0.5325	941.25
Col. Pct	0	0.05	0	0.11	0	0.42
8-2 Periodicals-OutsideC						
Vol-Var Costs	0	53318	2484.1	5835	1513.6	40190
Col. Pct	0	17.47	3.43	19.31	2.3	17.79
10--Standard - ECR						
Vol-Var Costs	0	24876	663.46	455.72	1943.5	5566.5
Col. Pct	0	8.15	0.92	1.51	2.95	2.46
11--Standard - Regular						
Vol-Var Costs	0	118127	4673.5	11265	19400	51937
Col. Pct	0	38.7	6.45	37.28	29.46	23
14--Packg S - Parcels						
Vol-Var Costs	0	2632.2	877.11	3207.1	646.95	677.3
Col. Pct	0	0.86	1.21	10.61	0.98	0.3
15--Packg S-Bound Print						
Vol-Var Costs	0	6884	669.87	360.58	137.93	1494.8
Col. Pct	0	2.26	0.92	1.19	0.21	0.66
16--Packg S-Media Mail						
Vol-Var Costs	0	4464.1	220.24	490.52	18.806	491.23
Col. Pct	0	1.46	0.3	1.62	0.03	0.22
18--USPS						
Vol-Var Costs	0	3126.9	2761.9	239.45	344.89	2054.6
Col. Pct	0	1.02	3.81	0.79	0.52	0.91
19--Free Mail						
Vol-Var Costs	0	1300.1	125.39	240	2.2148	374.32
Col. Pct	0	0.43	0.17	0.79	0	0.17
20--International Mail						
Vol-Var Costs	0	2015	704.01	396.65	35.188	2375.3
Col. Pct	0	0.66	0.97	1.31	0.05	1.05

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class	*Costpool* MODS 13 MPLSM	MODS 13 SPBS OTH	MODS 13 SPBSPRIO	MODS 13 1SACKS_M	MODS 13 1TRAYSRT	MODS 14 MANF
21--Registered Mail						
Vol-Var Costs	0	0	8.5021	40.603	47.794	49.788
Col. Pct	0	0	0.01	0.13	0.07	0.02
22--Certified Mail						
Vol-Var Costs	0	0	0.0408	0	0.1442	0
Col. Pct	0	0	0	0	0	0
23--Insured Mail						
Vol-Var Costs	0	0	0.0019	0	0.0138	0
Col. Pct	0	0	0	0	0	0
25--Special Handling						
Vol-Var Costs	0	0	94.72	0.0392	0.0219	0
Col. Pct	0	0	0.13	0	0	0
27--Other Spec. Services						
Vol-Var Costs	0	0	0.3895	0.076	1.7972	102.68
Col. Pct	0	0	0	0	0	0.05
Total	220.448	305273	72477.4	30214.3	65861.3	225854

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class	*Costpool* MODS 14 MANL	MODS 14 MANP	MODS 14 PRIORITY	MODS 15 LD15	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP
1--Letters - Single Piece							
Vol-Var Costs	483715	13084	10655	144359	171779	80590	29933
Col. Pct	61.11	20.16	7.58	73.19	81.54	43.73	14.48
2--Letters - Presort							
Vol-Var Costs	98138	1692.5	697.19	22651	5506.6	29571	6985.8
Col. Pct	12.4	2.61	0.5	11.48	2.61	16.05	3.38
3--Cards - Single Piece							
Vol-Var Costs	43005	111.96	276.92	5043.6	6081.1	1344.6	24.393
Col. Pct	5.43	0.17	0.2	2.56	2.89	0.73	0.01
4--Cards - Presort							
Vol-Var Costs	7372.8	2.3659	93.669	430.69	239.63	1853.6	5.1145
Col. Pct	0.93	0	0.07	0.22	0.11	1.01	0
5--Priority Mail							
Vol-Var Costs	3331.9	18778	108345	219.27	7031.2	10251	1837.1
Col. Pct	0.42	28.93	77.08	0.11	3.34	5.56	0.89
6--Express Mail							
Vol-Var Costs	1580.6	154.1	842.45	408.16	544.94	772.61	11.108
Col. Pct	0.2	0.24	0.6	0.21	0.26	0.42	0.01
8-1 Periodicals-InCounty							
Vol-Var Costs	305.96	13.894	1.595	0	0.9613	410.95	592.55
Col. Pct	0.04	0.02	0	0	0	0.22	0.29
8-2 Periodicals-OutsideC							
Vol-Var Costs	6950.7	1722.9	1064.9	1524.7	1689.1	13175	42873
Col. Pct	0.88	2.65	0.76	0.77	0.8	7.15	20.74
10--Standard - ECR							
Vol-Var Costs	3790.5	818.48	664.33	688.89	259.67	4784.3	5923.6
Col. Pct	0.48	1.26	0.47	0.35	0.12	2.6	2.87
11--Standard - Regular							
Vol-Var Costs	119482	11004	3960.3	14056	10758	35064	111178
Col. Pct	15.1	16.95	2.82	7.13	5.11	19.03	53.79
14--Packg S - Parcels							
Vol-Var Costs	297.84	8007.2	620.58	0	1814.1	2056.8	175.77
Col. Pct	0.04	12.34	0.44	0	0.86	1.12	0.09
15--Packg S-Bound Print							
Vol-Var Costs	192.46	2579.1	139.96	0	338.97	895.32	3691.9
Col. Pct	0.02	3.97	0.1	0	0.16	0.49	1.79
16--Packg S-Media Mail							
Vol-Var Costs	818.69	3026.8	476.31	0	622.14	233.19	366.53
Col. Pct	0.1	4.66	0.34	0	0.3	0.13	0.18
18--USPS							
Vol-Var Costs	11432	2461.7	9441.6	1262.3	2402.4	849.97	1060.2
Col. Pct	1.44	3.79	6.72	0.64	1.14	0.46	0.51
19--Free Mail							
Vol-Var Costs	352.25	16.747	101.9	135.88	297.42	0	126.44
Col. Pct	0.04	0.03	0.07	0.07	0.14	0	0.06
20--International Mail							
Vol-Var Costs	9528.9	1329	2716.8	6314.4	1270.8	2138.1	1794.4
Col. Pct	1.2	2.05	1.93	3.2	0.6	1.16	0.87

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class	*Costpool* MODS 14 MANL	MODS 14 MANP	MODS 14 PRIORITY	MODS 15 LD15	MODS 17 1CANCEL	MODS 17 1DSPATCH	MODS 17 1FLATPRP
21--Registered Mail							
Vol-Var Costs	31.429	108.71	21.883	0	34.055	298.06	91.641
Col. Pct	0	0.17	0.02	0	0.02	0.16	0.04
22--Certified Mail							
Vol-Var Costs	0	0.2682	0.046	0	0	0	0
Col. Pct	0	0	0	0	0	0	0
23--Insured Mail							
Vol-Var Costs	0	0.018	0.0073	0	0	0	0
Col. Pct	0	0	0	0	0	0	0
25--Special Handling							
Vol-Var Costs	84.763	0.0792	437.57	0	3.2097	0	0
Col. Pct	0.01	0	0.31	0	0	0	0
27--Other Spec. Services							
Vol-Var Costs	1096.9	2.1141	0.0203	142.05	1.7956	0	0.4601
Col. Pct	0.14	0	0	0.07	0	0	0
Total	791508	64913.8	140558	197236	210675	184289	206671

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class	*Costpool* MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG
1--Letters - Single Piece						
Vol-Var Costs	18629	21374	167530	39352	390479	46013
Col. Pct	75.45	11.44	37.27	42.8	36.96	41.24
2--Letters - Presort						
Vol-Var Costs	2314	9673.2	69243	13248	119719	6284.3
Col. Pct	9.37	5.18	15.4	14.41	11.33	5.63
3--Cards - Single Piece						
Vol-Var Costs	346.24	143.85	2618.2	916.82	12432	478.48
Col. Pct	1.4	0.08	0.58	1	1.18	0.43
4--Cards - Presort						
Vol-Var Costs	204.67	1.1092	2216.9	549	4126.8	0
Col. Pct	0.83	0	0.49	0.6	0.39	0
5--Priority Mail						
Vol-Var Costs	1177.6	5224.6	28219	3899.3	96667	12889
Col. Pct	4.77	2.8	6.28	4.24	9.15	11.55
6--Express Mail						
Vol-Var Costs	23.693	145.97	2080.2	325.16	12140	541.77
Col. Pct	0.1	0.08	0.46	0.35	1.15	0.49
8-1 Periodicals-InCounty						
Vol-Var Costs	0.2426	12.222	741.73	167.25	1092.7	141.75
Col. Pct	0	0.01	0.16	0.18	0.1	0.13
8-2 *Periodicals-OutsideC*						
Vol-Var Costs	203.05	12220	46915	5147.2	70357	11668
Col. Pct	0.82	6.54	10.44	5.6	6.66	10.46
10--Standard - ECR						
Vol-Var Costs	213.89	16653	9848.7	1986.1	24520	1585
Col. Pct	0.87	8.91	2.19	2.16	2.32	1.42
11--Standard - Regular						
Vol-Var Costs	903.97	113323	100397	23360	252574	18303
Col. Pct	3.66	60.65	22.33	25.4	23.91	16.41
14--Packg S - Parcels						
Vol-Var Costs	19.51	768.37	3379.5	469.13	16987	4188.8
Col. Pct	0.08	0.41	0.75	0.51	1.61	3.75
15--Packg S-Bound Print						
Vol-Var Costs	5.4147	1647	2659.6	478.72	10121	1222.8
Col. Pct	0.02	0.88	0.59	0.52	0.96	1.1
16--Packg S-Media Mail						
Vol-Var Costs	130.4	2369.4	3374.9	652.47	7542.8	1711.4
Col. Pct	0.53	1.27	0.75	0.71	0.71	1.53
18--USPS						
Vol-Var Costs	419.97	2912.2	5383.5	508.69	15358	2812.8
Col. Pct	1.7	1.56	1.2	0.55	1.45	2.52
19--Free Mail						
Vol-Var Costs	4.3601	143.53	1199.3	197.41	1769.2	518.81
Col. Pct	0.02	0.08	0.27	0.21	0.17	0.47
20--International Mail						
Vol-Var Costs	87.049	75.991	3348	678.16	20036	3176.1
Col. Pct	0.35	0.04	0.74	0.74	1.9	2.85

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class		*Costpool* MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM	MODS 17 1POUCHNG
21--Registered Mail							
	Vol-Var Costs	5.993	155.8	381.41	15.677	194.67	26.734
	Col. Pct	0.02	0.08	0.08	0.02	0.02	0.02
22--Certified Mail							
	Vol-Var Costs	0	0	0	0	0.1306	0
	Col. Pct	0	0	0	0	0	0
23--Insured Mail							
	Vol-Var Costs	0.0095	0	0	0	0.0141	0
	Col. Pct	0	0	0	0	0	0
25--Special Handling							
	Vol-Var Costs	0.0489	0	0	0.0026	107.64	0
	Col. Pct	0	0	0	0	0.01	0
27--Other Spec. Services							
	Vol-Var Costs	0.0033	0	0	0.0068	222.72	0
	Col. Pct	0	0	0	0	0.02	0
Total		24689.4	186844	449536	91951.6	1056448	111562

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class	*Costpool* MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	MODS 17 1SWYB	MODS 18 BUSREPLY	MODS 18 EXPRESS
1--Letters - Single Piece						
Vol-Var Costs	2496.5	20781	11537	13442	10669	5322.7
Col. Pct	21.11	18.5	36.63	31.17	35.3	6.54
2--Letters - Presort						
Vol-Var Costs	2645.6	8645.9	8253	5125.2	1084.5	1413.1
Col. Pct	22.37	7.7	26.2	11.88	3.59	1.74
3--Cards - Single Piece						
Vol-Var Costs	119.51	60.579	296.8	31.483	177.79	8.6299
Col. Pct	1.01	0.05	0.94	0.07	0.59	0.01
4--Cards - Presort						
Vol-Var Costs	192.12	280.63	320.94	3.8841	85.33	0
Col. Pct	1.62	0.25	1.02	0.01	0.28	0
5--Priority Mail						
Vol-Var Costs	111.53	11799	3637.3	16640	836.99	3706
Col. Pct	0.94	10.5	11.55	38.58	2.77	4.55
6--Express Mail						
Vol-Var Costs	60.143	1198.3	2388.6	3661.9	20.679	56972
Col. Pct	0.51	1.07	7.58	8.49	0.07	69.96
8-1 Periodicals-InCounty						
Vol-Var Costs	62.22	273.43	4.1506	4.6426	0.1346	9.4289
Col. Pct	0.53	0.24	0.01	0.01	0	0.01
8-2 Periodicals-OutsideC						
Vol-Var Costs	533.42	18734	720.64	699.99	320.19	663.94
Col. Pct	4.51	16.68	2.29	1.62	1.06	0.82
10--Standard - ECR						
Vol-Var Costs	607.67	5127.5	845.13	214.88	7.5532	38.098
Col. Pct	5.14	4.56	2.68	0.5	0.02	0.05
11--Standard - Regular						
Vol-Var Costs	3871.2	29788	2510.7	1235.4	747.82	919.82
Col. Pct	32.73	26.52	7.97	2.86	2.47	1.13
14--Packg S - Parcels						
Vol-Var Costs	159.58	7909	23.941	3.7681	1197.2	160.54
Col. Pct	1.35	7.04	0.08	0.01	3.96	0.2
15--Packg S-Bound Print						
Vol-Var Costs	59.085	2106.7	14.215	3.8917	2.0757	5.3009
Col. Pct	0.5	1.88	0.05	0.01	0.01	0.01
16--Packg S-Media Mail						
Vol-Var Costs	92.929	1007	14.243	3.2342	4.4282	8.6162
Col. Pct	0.79	0.9	0.05	0.01	0.01	0.01
18--USPS						
Vol-Var Costs	746.92	1740.6	219.65	1229.6	2089.3	3153
Col. Pct	6.31	1.55	0.7	2.85	6.91	3.87
19--Free Mail						
Vol-Var Costs	1.5784	441.7	7.4884	0.8684	4.0124	145.59
Col. Pct	0.01	0.39	0.02	0	0.01	0.18
20--International Mail						
Vol-Var Costs	62.175	2353.8	684.86	815.48	605.5	8708.3
Col. Pct	0.53	2.1	2.17	1.89	2	10.69

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class		*Costpool* MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	MODS 17 1SWYB	MODS 18 BUSREPLY	MODS 18 EXPRESS
21--Registered Mail							
	Vol-Var Costs	6.0857	76.153	20.241	13.124	3.014	201.6
	Col. Pct	0.05	0.07	0.06	0.03	0.01	0.25
22--Certified Mail							
	Vol-Var Costs	0.0153	0	0.2288	0.1504	0	0
	Col. Pct	0	0	0	0	0	0
23--Insured Mail							
	Vol-Var Costs	0	0	0.0238	0.0071	0	0
	Col. Pct	0	0	0	0	0	0
25--Special Handling							
	Vol-Var Costs	0.018	0	0.0507	0.0999	0.0005	0
	Col. Pct	0	0	0	0	0	0
27--Other Spec. Services							
	Vol-Var Costs	0.0075	0.6503	0.6939	1.9842	12368	0
	Col. Pct	0	0	0	0	40.92	0
Total		11828.4	112324	31500.2	43132.2	30224.3	81436.6

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class	*Costpool* MODS 18 MAILGRAM	MODS 18 REGISTRY	MODS 18 REWRAP	MODS 18 1EEQMT	MODS 19 INTL ISC	MODS 19 PMPC
1--Letters - Single Piece						
Vol-Var Costs	0	5435.3	7129.3	6923.3	9722.6	3377.9
Col. Pct	0	9.23	51.04	28.5	7.31	3.2
2--Letters - Presort						
Vol-Var Costs	0	169.24	387.66	2102.2	1332.6	812.99
Col. Pct	0	0.29	2.78	8.65	1	0.77
3--Cards - Single Piece						
Vol-Var Costs	0	152.71	346.41	250.77	394.37	58.754
Col. Pct	0	0.26	2.48	1.03	0.3	0.06
4--Cards - Presort						
Vol-Var Costs	0	51.619	2.4425	64.564	0.1724	0.605
Col. Pct	0	0.09	0.02	0.27	0	0
5--Priority Mail						
Vol-Var Costs	0	1516.3	1124.6	1508.7	7138.5	89379
Col. Pct	0	2.57	8.05	6.21	5.37	84.55
6--Express Mail						
Vol-Var Costs	0	1317.5	2.5033	161.3	4820.1	8.7509
Col. Pct	0	2.24	0.02	0.66	3.62	0.01
8-1 Periodicals-InCounty						
Vol-Var Costs	0	0.5584	0.1998	18.478	2.0469	0.656
Col. Pct	0	0	0	0.08	0	0
8-2 Periodicals-OutsideC						
Vol-Var Costs	0	82.917	831.77	1395	859	280.32
Col. Pct	0	0.14	5.95	5.74	0.65	0.27
10--Standard - ECR						
Vol-Var Costs	0	41.768	16.051	492.2	170.73	9.5717
Col. Pct	0	0.07	0.11	2.03	0.13	0.01
11--Standard - Regular						
Vol-Var Costs	0	810.58	2826.6	10123	2030.5	907.58
Col. Pct	0	1.38	20.23	41.66	1.53	0.86
14--Packg S - Parcels						
Vol-Var Costs	0	346.6	443.08	204.94	1765.6	202
Col. Pct	0	0.59	3.17	0.84	1.33	0.19
15--Packg S-Bound Print						
Vol-Var Costs	0	83.745	121.97	149.77	165.03	3.3405
Col. Pct	0	0.14	0.87	0.62	0.12	0
16--Packg S-Media Mail						
Vol-Var Costs	0	0	11.185	129.56	145.93	3.6605
Col. Pct	0	0	0.08	0.53	0.11	0
18--USPS						
Vol-Var Costs	0	9584.2	501.5	266.76	904.62	8948.7
Col. Pct	0	16.27	3.59	1.1	0.68	8.46
19--Free Mail						
Vol-Var Costs	0	82.574	7.1512	28.221	266.75	0.1946
Col. Pct	0	0.14	0.05	0.12	0.2	0
20--International Mail						
Vol-Var Costs	0	7072.6	208.99	388.45	103123	1719
Col. Pct	0	12	1.5	1.6	77.51	1.63

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class		*Costpool* MODS 18 MAILGRAM	MODS 18 REGISTRY	MODS 18 REWRAP	MODS 18 1EEQMT	MODS 19 INTL ISC	MODS 19 PMPC
21--Registered Mail							
	Vol-Var Costs	66.485	31909	7.1383	68.478	199.66	3.9552
	Col. Pct	100	54.16	0.05	0.28	0.15	0
22--Certified Mail							
	Vol-Var Costs	0	0	0	0.1928	0	0.0097
	Col. Pct	0	0	0	0	0	0
23--Insured Mail							
	Vol-Var Costs	0	0	0	0.0145	0	0.0011
	Col. Pct	0	0	0	0	0	0
25--Special Handling							
	Vol-Var Costs	0	0	0.0484	3.2322	0	0.0295
	Col. Pct	0	0	0	0.01	0	0
27--Other Spec. Services							
	Vol-Var Costs	0	261.76	0.3727	17.417	0	0.1626
	Col. Pct	0	0.44	0	0.07	0	0
Total		66.4852	58918.5	13968.9	24296	133042	105717

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class	*Costpool* MODS 49 LD49	MODS 79 LD79	MODS 99 1SUPP_F1	Total
1--Letters - Single Piece				
Vol-Var Costs	79203	17330	131525	3129795
Col. Pct	35.05	12.46	39.51	
2--Letters - Presort				
Vol-Var Costs	64816	22456	38657	961427
Col. Pct	28.68	16.15	11.61	
3--Cards - Single Piece				
Vol-Var Costs	7129.2	1264.4	4486.5	111188
Col. Pct	3.15	0.91	1.35	
4--Cards - Presort				
Vol-Var Costs	2828.2	354.52	1261.6	32089
Col. Pct	1.25	0.25	0.38	
5--Priority Mail				
Vol-Var Costs	1352.1	5876.9	23597	548655
Col. Pct	0.6	4.23	7.09	
6--Express Mail				
Vol-Var Costs	16.836	0	4128	95762
Col. Pct	0.01	0	1.24	
8-1 Periodicals-InCounty				
Vol-Var Costs	184.91	1112.6	297.75	7090.8
Col. Pct	0.08	0.8	0.09	
8-2 Periodicals-OutsideC				
Vol-Var Costs	28825	7623.9	19826	488662
Col. Pct	12.76	5.48	5.96	
10--Standard - ECR				
Vol-Var Costs	1155.1	7282	6665.7	155759
Col. Pct	0.51	5.24	2	
11--Standard - Regular				
Vol-Var Costs	16820	60571	79531	1861456
Col. Pct	7.44	43.55	23.89	
14--Packg S - Parcels				
Vol-Var Costs	446.44	578.87	2741.1	64024
Col. Pct	0.2	0.42	0.82	
15--Packg S-Bound Print				
Vol-Var Costs	1559.2	454.01	1859.3	44683
Col. Pct	0.69	0.33	0.56	
16--Packg S-Media Mail				
Vol-Var Costs	585.48	1003.6	1436.4	33901
Col. Pct	0.26	0.72	0.43	
18--USPS				
Vol-Var Costs	12374	12747	5330.1	136000
Col. Pct	5.48	9.17	1.6	
19--Free Mail				
Vol-Var Costs	428.86	1.5869	411.25	9967.4
Col. Pct	0.19	0	0.12	
20--International Mail				
Vol-Var Costs	1403.4	372.47	8882	207413
Col. Pct	0.62	0.27	2.67	

TABLE 3 : FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - PLANTS GROUP

Mail class		*Costpool* MODS 49 LD49	MODS 79 LD79	MODS 99 1SUPP_F1	Total
21--Registered Mail					
	Vol-Var Costs	108.72	41.811	1549.2	36041
	Col. Pct	0.05	0.03	0.47	
22--Certified Mail					
	Vol-Var Costs	0.0325	0	0.0674	1.5953
	Col. Pct	0	0	0	
23--Insured Mail					
	Vol-Var Costs	0.0051	0	0.0072	0.1717
	Col. Pct	0	0	0	
25--Special Handling					
	Vol-Var Costs	102.64	0	45.022	1146.9
	Col. Pct	0.05	0	0.01	
27--Other Spec. Services					
	Vol-Var Costs	6633.2	0	676.84	22332
	Col. Pct	2.94	0	0.2	
Total		225972	139071	332907	7947394

TABLE 3 : FY 03 MAIL PROCESSING VOLUME-VARIABLE COSTS - POST OFFICES, STA's/BR's
(NonMODS Offices and MODS 1& 2 LDC 41-44 & 48)

Mail class	Costpool ALLIED	AUTO/ MEC	EXPRS IN	EXPRS OUT	MANF	MANL	MANP	MISC	REGIS TRY	Total
1--Letters - Single Piece										
Vol-Var Costs	268715	80369	287.99	70.724	153967	428430	37051	168405	6838.7	1144135
Col. Pct	34.43	42.15	3.37	1.4	30.79	55.5	13.36	34.71	29.15	
2--Letters - Presort										
Vol-Var Costs	91420	56838	29.013	34.29	15802	141480	945.92	64302	376.04	371227
Col. Pct	11.71	29.81	0.34	0.68	3.16	18.33	0.34	13.25	1.6	
3--Cards - Single Piece										
Vol-Var Costs	8735.5	3859.2	1.9069	3.5719	89.008	23302	24.318	8126.9	1.3783	44144
Col. Pct	1.12	2.02	0.02	0.07	0.02	3.02	0.01	1.68	0.01	
4--Cards - Presort										
Vol-Var Costs	1383.6	1441.5	0.4307	2.1431	94.608	5734	0	2075.4	0.2968	10732
Col. Pct	0.18	0.76	0.01	0.04	0.02	0.74	0	0.43	0	
5--Priority Mail										
Vol-Var Costs	48522	176.99	8.681	89.298	20101	2722.8	86703	18791	1330.2	178444
Col. Pct	6.22	0.09	0.1	1.76	4.02	0.35	31.27	3.87	5.67	
6--Express Mail										
Vol-Var Costs	8608.2	0	7051.9	4086.3	1368.8	50.859	618.19	7903.4	1917.2	31605
Col. Pct	1.1	0	82.45	80.73	0.27	0.01	0.22	1.63	8.17	
7--Mailgram										
Vol-Var Costs	0	0	0	4.2863	0	0	0	0	0	4.2863
Col. Pct	0	0	0	0.08	0	0	0	0	0	
8-1 *Periodicals-InCounty*										
Vol-Var Costs	4352.3	0	0.3582	0	2424.1	3.3237	5.1919	749.91	0.5609	7535.7
Col. Pct	0.56	0	0	0	0.48	0	0	0.15	0	
8-2 Periodicals-OutsideC										
Vol-Var Costs	54361	2045	15.253	2.8575	97839	9776.5	3600.6	25205	275.76	193121
Col. Pct	6.97	1.07	0.18	0.06	19.56	1.27	1.3	5.2	1.18	
10--Standard - ECR										
Vol-Var Costs	51410	3079	10.955	0.7144	33193	8620	2693.7	11564	13.796	110585
Col. Pct	6.59	1.61	0.13	0.01	6.64	1.12	0.97	2.38	0.06	
11--Standard - Regular										
Vol-Var Costs	190680	41867	50.113	0.7144	163298	142407	62964	80267	196.9	681730
Col. Pct	24.43	21.95	0.59	0.01	32.65	18.45	22.71	16.55	0.84	
14--Packg S - Parcels										
Vol-Var Costs	18125	0	2.5658	3.5719	474.34	305.15	44335	8889.4	587.88	72723
Col. Pct	2.32	0	0.03	0.07	0.09	0.04	15.99	1.83	2.51	
15--Packg S-Bound Print										
Vol-Var Costs	9424.2	348.55	0.7685	0	4201.3	990.99	13537	4237.7	230.17	32971
Col. Pct	1.21	0.18	0.01	0	0.84	0.13	4.88	0.87	0.98	
16--Packg S-Media Mail										
Vol-Var Costs	6351	0	528.95	0	1319.3	191.84	12831	3258.7	78.759	24560
Col. Pct	0.81	0	6.18	0	0.26	0.02	4.63	0.67	0.34	
18--USPS										
Vol-Var Costs	13586	285.98	558.03	0	3519.6	4141	7067.2	14570	3280.7	47008
Col. Pct	1.74	0.15	6.52	0	0.7	0.54	2.55	3	13.98	
19--Free Mail										
Vol-Var Costs	448.13	0	0.1031	0	241.54	591.92	1740.4	406.8	0	3428.9
Col. Pct	0.06	0	0	0	0.05	0.08	0.63	0.08	0	
20--International Mail										
Vol-Var Costs	4360.8	383.37	1.9102	754.39	2026.5	3006.4	2932.4	5016.7	4600.6	23083
Col. Pct	0.56	0.2	0.02	14.9	0.41	0.39	1.06	1.03	19.61	

TABLE 3 : FY 03 MAIL PROCESSING VOLUME-VARIABLE COSTS - POST OFFICES, STA's/BR's
(NonMODS Offices and MODS 1& 2 LDC 41-44 & 48)

Mail class	*Costpool* ALLIED	AUTO/ MEC	EXPRS IN	EXPRS OUT	MANF	MANL	MANP	MISC	REGISTRY	Total
21--Registered Mail										
Vol-Var Costs	0	0	0.3077	5.7151	177.96	247.51	207.93	1801.3	3729.3	6170
Col. Pct	0	0	0	0.11	0.04	0.03	0.07	0.37	15.9	
22--Certified Mail										
Vol-Var Costs	0	0	1.2342	0	0	0.5303	0	31902	0.3018	31904
Col. Pct	0	0	0.01	0	0	0	0	6.58	0	
23--Insured Mail										
Vol-Var Costs	0	0	0.0062	0	0	0	0	1437.8	0	1437.8
Col. Pct	0	0	0	0	0	0	0	0.3	0	
24--COD										
Vol-Var Costs	0	0	0.0338	0.7144	0	0.0384	0	1344.2	0	1345
Col. Pct	0	0	0	0.01	0	0	0	0.28	0	
27--Other Spec. Services										
Vol-Var Costs	0	0	2.0215	2.1431	0	0.5629	0	24870	1.0197	24876
Col. Pct	0	0	0.02	0.04	0	0	0	5.13	0	
Total	780483	190693	8552.57	5061.39	500136	772002	277258	485124	23459.6	3042770

TABLE 3: FY03 MAIL PROCESSING VOLUME-VARIABLE COSTS - BMCs

Mail class	*Costpool* NMO	OTHR	PLA	PSM	SPB	SSM	Total
1--Letters - Single Piece							
Vol-Var Costs	333.1	6506.1	1922.2	485.12	664.09	21.056	9931.7
Col. Pct	1.02	2.41	1.05	0.79	1.14	0.09	
2--Letters - Presort							
Vol-Var Costs	1.1806	1608.9	639.6	1.625	0	0.6886	2252
Col. Pct	0	0.6	0.35	0	0	0	
3--Cards - Single Piece							
Vol-Var Costs	2.5807	237.56	38.328	0	0	0.0927	278.56
Col. Pct	0.01	0.09	0.02	0	0	0	
5--Priority Mail							
Vol-Var Costs	2028.6	13595	7588.8	4421.8	680.26	32.827	28347
Col. Pct	6.19	5.03	4.14	7.24	1.17	0.14	
6--Express Mail							
Vol-Var Costs	224.81	0	70.136	0.0483	0	0.0656	295.06
Col. Pct	0.69	0	0.04	0	0	0	
8-1 Periodicals-InCounty							
Vol-Var Costs	1.3327	91.914	51.899	0.9647	0	17.651	163.76
Col. Pct	0	0.03	0.03	0	0	0.07	
8-2 Periodicals-OutsideC							
Vol-Var Costs	896.97	13736	9686.6	323.31	1550.6	2727.7	28921
Col. Pct	2.74	5.09	5.29	0.53	2.67	11.54	
10--Standard - ECR							
Vol-Var Costs	719.37	3962.5	3930.9	61.295	2372.5	810.14	11857
Col. Pct	2.2	1.47	2.15	0.1	4.09	3.43	
11--Standard - Regular							
Vol-Var Costs	5333.8	108995	73179	18330	37252	14648	257738
Col. Pct	16.29	40.36	39.94	30.03	64.21	61.95	
14--Packg S - Parcels							
Vol-Var Costs	13371	43833	33691	10185	3042.5	2120.5	106243
Col. Pct	40.83	16.23	18.39	16.69	5.24	8.97	
15--Packg S-Bound Print							
Vol-Var Costs	674.65	17599	15707	9796	4640.3	843.83	49261
Col. Pct	2.06	6.52	8.57	16.05	8	3.57	
16--Packg S-Media Mail							
Vol-Var Costs	1236.4	21035	14189	10690	3176.4	1035.1	51362
Col. Pct	3.78	7.79	7.74	17.51	5.47	4.38	
18--USPS							
Vol-Var Costs	3078.8	18766	9448.7	2212.2	3609.6	396.47	37512
Col. Pct	9.4	6.95	5.16	3.62	6.22	1.68	
19--Free Mail							
Vol-Var Costs	92.749	684.23	924.83	276.28	34.53	12.09	2024.7
Col. Pct	0.28	0.25	0.5	0.45	0.06	0.05	
20--International Mail							
Vol-Var Costs	4751.526	19163.81	12098.82	4254.328	994.77	976.7803	42240.04
Col. Pct	14.51	7.09	6.61	6.97	1.71	4.14	
27--Other Spec. Services							
Vol-Var Costs	0.1326	237.4	66.949	0.0968	0	0.1006	304.68
Col. Pct	0	0.09	0.04	0	0	0	
Total							
	32747.2	270052	183233	61037.3	58017.9	23642.8	628730

Table 4. FY 03 IOCS Mail Processing Mixed-Mail Tallies - Clerks/Mailhandlers
Crosswalk of Q.19 actv code to item/container information
Allied Cost Pools - Plants
Exclude Empty Items and Containers
(similar to Table 1 of Degen's Rebuttal Testimony, Docket No. R2000-1, Tr. 38/17324 (Aug 23, 2000)).

	Mixed	Mixed Item/Container Tally Dollar Weights Adjusted to the Cost Pool (000)						
Shape	Actv(Q19)	Letters	Flats	Parcels	Class	None	Total	% of Total
Letters	5610	27,516	1,553	259	58	141	29,527	7.2%
Flats	5620	106.32	19,550	251	93	2,969	22,969	5.6%
Parcels	5700	928	164	2,830	2,156	535	6,613	1.6%
None	5750	133,410	82,406	51,580	41,138	42,167	350,701	85.6%
Total		161,961	103,672	54,919	43,445	45,812	409,809	100.0%
% of Total		40%	25%	13%	11%	11%	100%	
% 5750 of Total 5750		38%	23%	15%	12%	12%	100%	
% 5750 w/ shape or class from item/container of total mixed-mail							75%	

Note: This table was created using the FY 03 IOCS data set. Cost pool
assignments are based on the MODS based cost distribution methodology described in Part II.
This methodology is also used to classify individual tallies as mixed-mail items, counted mixed-mail containers,
and uncounted mixed-mail containers. All mixed-mail tallies are then summed by mixed-mail activity code (IOCS filed F9806)
and item/container categories based on item and container type. Item type is assigned, based on IOCS field F9214,
container type based on IOCS field F9219, and counted container contents based on IOCS field F9901 through F9919
f9420-f9421. Individual item and container types are assigned to the above categories as follows:
Letters <-- loose cards and letters in containers and letter trays
Flats <-- loose flats in containers and flat trays
Parcels <-- loose IPP's and parcels in containers and small parcel trays
Class <-- all sacks (individual items and in counted containers)
None <-- all remaining items and container types.

Table 5: FY 03 C/S 3 Mail Processing Costs and Volume-Variabilities by Cost Pool - PRC Version

A. MAIL PROCESSING - PLANTS GROUP

SAS name		Cost Pool Title	USPS Pool Total Costs	PRC Mail Proc Pool costs (exclude 'migrated')	PRC Mail Proc Vol.Var. Costs (i.e. exclude 'fixed')	PRC Pool Volume-Variable Factor
		Automated Equipment				
BCS/	1	BCS - Other than CBCS/DBCS	177,798	174,997	174,177	0.9953
BCS/DBCS	2	CBCS / DBCS	1,194,807	1,177,020	1,173,992	0.9974
OCR/	3	OCR*	237,787	233,989	233,210	0.9967
		Mechanized, Letters & Flats				
AFSM100	4	AFSM100 - LDC 12 (incl. LDC 15 VCS Flat keying)	578,742	569,112	568,007	0.9981
FSM/	5	FSM - Other than FSM 1000 & AFSM100	24,661	24,278	23,979	0.9877
FSM/1000	6	FSM 1000	254,647	251,252	250,081	0.9953
		Mechanized, Other				
MECPAR(	7	Mechanized Parcels	8,940	8,517	8,450	0.9922
MPLSM		LSM, MPLSM	245	245	245	
SPBS OTI	8	SPBS - Non Priority	418,182	411,753	410,101	0.9960
SPBSPRI	9	SPBS - Priority	99,284	96,623	96,194	0.9956
1SACKS_	10	Mechanical Sort - Sack Outside	36,847	36,206	35,365	0.9768
1TRAYSR	11	Mechanical Tray Sorter	80,318	78,677	77,748	0.9882
		Manual Operations				
MANF	12	Manual Flats	259,602	256,574	255,508	0.9958
MANL	13	Manual Letters	1,027,932	1,007,519	1,001,473	0.9940
MANP	14	Manual Parcels	81,142	78,656	77,555	0.9860
PRIORITY	15	Manual Priority	230,422	224,390	222,943	0.9935
LD15	16	**LDC 15 - RBCS**	197,236	197,235	197,235	1.0000
		Allied Operations				
1CANCEL	17	Cancellation	292,604	284,304	278,868	0.9809
1DSPATC	18	Dispatch	224,741	220,404	216,466	0.9821
1FLATPR	19	Flats Preparation	252,038	246,853	245,555	0.9947
1MTRPRE	20	Mail Preparation - metered	35,270	34,116	33,701	0.9878
1OPBULK	21	Opening Unit - BBM	227,857	220,875	218,886	0.9910
1OPPREF	22	Opening Unit - Preferred Mail	548,214	534,045	527,996	0.9887
1OPTRAN	23	Opening - Manual transport	112,136	108,405	106,029	0.9781
1PLATFR	24	Platform	1,288,351	1,256,468	1,168,592	0.9301
1POUCHI	25	Pouching Operations	136,050	132,911	131,423	0.9888
1PRESOF	26	Presort	14,425	11,877	8,936	0.7524
1SACKS_	27	Manual Sort - Sack Outside	136,980	134,303	130,075	0.9685
1SCAN	28	Air Contract DCS and Incoming/SWYB	38,415	36,843	35,800	0.9717
1SWYB		Scan Where You Band	52,600	50,001	49,390	0.9878
		Other Operations				
BUSREPL	29	Business Reply / Postage Due	36,859	34,827	33,533	0.9629
EXPRESS	30	Express Mail	99,313	90,867	82,712	0.9102
MAILGRA	31	Mailgram	62	38	12	0.3127
REGISTR	32	Registry	151,073	145,618	62,737	0.4308
REWRAP	33	Damaged Parcel Rewrap	17,035	15,941	13,307	0.8348
1EEQMT	34	Empty Equipment	29,629	25,893	24,598	0.9500
1MISC	35	Miscellaneous Activity	183,951	131,600	113,820	0.8649
1SUPPOF	36	Mail Processing Support	222,033	50,333	44,824	0.8906
LD49	37	LDC 49 - Computerized Forwarding Syst.	275,576	269,760	268,376	0.9949
LD79	38	LDC 79 - Mailing Req' & Bus. Mail Entry	169,598	122,587	57,111	0.4659
INTL ISC	39	**ISCs (International Service Centers)**	162,246	153,074	145,267	0.9490
PMPC	40	**PMPCs (Priority Mail Processing Centers)**	128,923	123,858	120,770	0.9751
		MAIL PROCESSING TOTAL FOR PLANTS	9,744,570	9,262,845	8,925,048	0.9635

B. MAIL PROCESSING - POST-OFFICES, STATIONS & BRANCHES GROUP

SAS name	Cost Pool Title	USPS Pool Total Costs	PRC Mail Proc Pool costs (excl 'migrated')	PRC Mail Proc Pool costs (excl 'clock in/out')	PRC MP Volume-Variable Cost (excl 'clock in/out')	PRC Pool Volume-Variable Fraction	PRC Mail Proc Pool costs (incl 'clock in/out')	PRC MP Volume-Variable Cost (incl 'clock in/out')	PRC Pool Volume-Variable Fraction
	B.1 MODS 1&2 Offices								
LD41	LDC 41 - Unit Distribution - Automated	26,166	24,910				24,910	24,775	0.9946
LD42	LDC 42 - Unit Distribution - Mechanized	858	845				845	845	1.0000
LD43	LDC 43 - Unit Distribution - Manual	653,539	620,498				620,498	603,489	0.9726
LD44	LDC 44 - Post-Office Box Distribution	154,431	136,398				136,398	134,035	0.9827
LD48 EXP	LDC 48 - Customer Service / Express	9,956	9,148				9,148	8,456	0.9244
LD48 OTH	LDC 48 - Customer Service / Other	191,332	135,627				135,627	117,568	0.8668
LD48_ADM	LDC 48 - Customer Service / Admin	195,428	73,957				73,957	60,115	0.8128
LD48_SSV	LDC 48 - Customer Service / Spec.Servc.	98,479	83,906				83,906	52,656	0.6276
	Subtotal	*1,453,235*	1,085,290				1,085,290	1,001,938	0.9232
	B.2 Non-MODS Offices								
						(exclude 'clock in/out')			(include 'clock in/out')
ALLIED	Allied			688,334	647,969	0.9414	700,633	659,547	0.9414
AUTO/MECH	Automated/Mechanized			200,696	200,281	0.9979	204,281	203,859	0.9979
EXPRESS	Express Mail			7,320	7,320	1.0000	7,451	7,451	1.0000
MANF	Manual Flat			444,450	444,163	0.9994	452,391	452,099	0.9994
MANL	Manual Letter			671,927	670,801	0.9983	683,932	682,787	0.9983
MANP	Manual Parcel			218,277	217,891	0.9982	222,177	221,784	0.9982
MISC	Miscellaneous			370,979	258,855	0.6978	377,607	263,480	0.6978
REGISTRY	Registry			42,510	17,172	0.4040	43,270	17,479	0.4040
	Subtotal			2,644,492	2,464,452	0.9319	2,691,743	2,508,486	0.9319
	MAIL PROC.TOTAL FOR P.O. STA/BRs						3,777,033	3,510,424	0.9294
	C. MAIL PROCESSING - BMCs GROUP								
NMO	Non-Machinable Outside (NMO)			38,762	38,762	1.0000	39,936	39,936	1.0000
OTHR	Allied Labor & all other Mail Processing			319,652	311,283	0.9738	329,332	320,709	0.9738
PLA	Platform			216,890	203,306	0.9374	223,457	209,462	0.9374
PSM	Parcel Sorting Machine			72,248	72,248	1.0000	74,436	74,436	1.0000
SPB	SPBS & Irregular Parcels (IPP & 115)			68,674	68,674	1.0000	70,753	70,753	1.0000
SSM	Sack Sorting Machine			27,985	27,985	1.0000	28,832	28,832	1.0000
	MAIL PROCESSING TOTAL FOR BMCs			744,211	722,257	0.9705	766,746	744,127	0.9705

Table 5.1 FY 03 Subclass Volume-Variable Costs by Subgroups of Cost Pools, USPS and PRC Versions - Plants

Plants	Distribution Operations (ldc 11-15)		Allied Operations (ldc 17)		function 1 Support (ldc 18,misc&1support)		LDC 18-other (incl Spec Srvcs Ops)		Other (isc,pmpc,ldc 49 79)		Total for Plants	
	PRC	USPS	PRC	USPS	PRC	USPS	PRC	USPS	PRC	USPS	PRC	USPS
1--Letters - Single Piece 2/	2,146,515	1,839,220	1,265,102	1,013,936	69,372	131,525	37,297	35,480	115,222	109,634	3,633,507	3,129,793
2--Letters - Presort	613,044	540,981	323,375	287,215	19,432	38,657	5,160	5,157	88,546	89,418	1,049,557	961,426
3--*Cards - Single Piece*	87,259	72,026	42,018	24,894	2,244	4,487	1,114	936	9,437	8,847	142,072	111,189
4--Cards - Presort	20,660	17,445	11,845	9,994	494	1,262	209	204	3,515	3,183	36,722	32,089
5--Priority Mail 2/	307,733	213,236	204,307	199,384	10,755	23,597	8,810	8,693	114,056	103,747	645,660	548,656
6--Express Mail	6,283	4,420	30,812	23,894	1,763	4,128	59,743	58,474	5,253	4,846	103,853	95,763
8-1 Periodicals-InCounty	2,294	1,959	3,682	3,505	71	298	29	29	691	1,300	6,767	7,091
8-2 Periodicals-OutsideC	239,540	203,018	246,439	224,935	9,008	19,826	3,310	3,294	38,656	37,588	536,953	488,662
10--Standard - ECR	81,277	67,311	75,134	72,569	2,131	6,666	659	596	4,657	8,617	163,859	155,759
11--*Standard - Regular*	1,131,654	982,903	762,358	703,266	32,986	79,531	16,030	15,428	48,590	80,329	1,991,618	1,861,457
14--Packg S - Parcels	20,526	17,982	35,563	37,955	904	2,741	2,478	2,352	2,921	2,993	62,392	64,023
15--Packg S-Bound Print	21,245	17,035	22,119	23,245	663	1,859	381	363	2,254	2,182	46,661	44,683
16--Packg S-Media Mail	15,518	12,451	19,206	18,121	1,002	1,436	162	154	1,249	1,739	37,136	33,901
18--USPS	53,137	44,455	48,973	35,645	2,188	5,330	9,281	15,595	29,938	34,974	143,516	135,999
19--Free Mail	4,851	3,883	4,140	4,708	124	411	283	268	797	697	10,196	9,967
20--International Mail	46,792	38,407	49,677	36,521	3,105	8,882	17,760	16,984	113,162	106,618	230,495	207,412
21--*Registered Mail* 2/	1,539	563	1,470	1,320	605	1,549	63,586	32,256	5,710	354	72,910	36,042
22--Certified Mail	66	1	72	1	484	0	1,253	0	82	0	1,957	2
23--Insured Mail	1	0	219	0	171	0	4	0	0	0	395	0
24--COD	0		1		0		1		0		2	-
25--Special Handling	94	885	75	111	3	45	0	3	85	103	258	1,147
27--Other Spec. Services	6,834	2,145	5,699	228	1,376	677	14,009	12,648	8,919	6,633	36,836	22,331
	4,806,861	4,080,327	3,152,285	2,721,451	158,879	332,907	241,558	208,911	593,739	603,802	8,953,323	7,947,391
Subtotal	4,806,861	4,080,327	3,152,285	2,721,451	158,879	332,907	241,558	208,911	593,739	603,802	8,953,323	7,947,391
Registry Fixed 1/	(597)		(570)		(235)		(24,659)		(2,214)		(28,274)	
Volume-Variable Costs	4,806,264	4,080,327	3,151,715	2,721,451	158,645	332,907	216,899	208,911	591,525	603,802	8,925,048	7,947,391
Volume-Variable Fraction	100%	83%	96%	81%	87%	82%	69%	63%	88%	82%	96%	82%
Total Mail Processing Costs	4,827,045	4,908,594	3,271,403	3,359,686	181,933	405,984	313,183	333,990	669,280	736,343	9,262,845	9,744,597

1/ For the PRC version, these costs represent the disaggregated fixed costs for Registry from PRC WS 3 0.2

2/ For the PRC version, these costs represent disaggregated costs for those shown in PRC WS 3 1 1a,
however, the Registry costs include the fixed costs which will be deducted from the "Registry Fixed" row amount
These costs do not show reallocated costs from further adjustment to the Registry Costs in PRC WS 3 1 1

Table 5.2 FY 03 Subclass Volume-Variable Costs by Subgroups of Cost Pools, USPS and PRC Versions - Post-Offices, Stations, and Branches

Post-Offices, Stations/Branches	LDC 41-44 LDC 48	non-MODS offices 1/	Total	
	PRC	PRC	PRC	USPS
1--Letters - Single Piece 2/				
2--Letters - Presort	352,058	976,204	1,328,262	1,144,135
3--Cards - Single Piece	111,904	322,296	434,200	371,227
4--Cards - Presort	12,698	39,932	52,630	44,144
5--Priority Mail 2/	3,347	9,696	13,043	10,732
6--Express Mail	67,848	125,053	192,901	178,444
7--Mailgram	19,957	16,820	36,777	31,605
8-1 Periodicals-InCounty				
8-2 Periodicals-OutsideC	1,470	6,267	7,737	4
10--Standard - ECR	65,246	154,459	219,705	7,536
11--Standard - Regular	38,467	82,869	121,336	193,121
14--Packg S - Parcels	212,486	562,343	774,829	110,585
15--Packg S-Bound Print	25,112	51,062	76,174	681,730
16--Packg S-Media Mail	11,763	23,125	34,888	72,723
18--USPS	10,890	16,640	27,530	32,971
19--Free Mail	18,330	34,774	53,104	24,560
20--International Mail	849	3,116	3,964	47,008
21--Registered Mail 2/	12,986	15,755	28,741	3,429
22--Certified Mail	5,162	5,685	10,847	23,083
23--Insured Mail	14,790	31,915	46,705	6,170
24--COD	1,658	909	2,568	31,904
25--SPECIAL HAND	619	1,392	2,012	1,438
27--Other Spec. Services	-		-	1,345
	16,299	28,169	44,468	24,876
Subtotal				
Registry fixed	1,003,940	2,508,482	3,512,422	3,042,770
	(2,002)		(2,002)	
Volume-Variable Costs				
Volume-Variable Fraction	1,001,938	2,508,482	3,510,420	3,042,770
	92%	93%	93%	81%
Total Mail Processing costs				
	1,085,290	2,691,742	3,777,032	3,754,712

1/ includes clocking in/out costs. exclude Registry fixed costs (costs from PRC Workpapers WS 3.1.1a)

2/ For the PRC version, the costs for the LDC 41-44 and 48 cost pools represent disaggregated costs that are the outputs from the SAS program. These costs are the LDC41-44, and 48 costs for the MODS 1&2 costs shown PRC WS 3.1.1a but the Registry costs include the fixed costs shown in the "Registry fixed" row. Also these costs do not show reallocated costs from further adjustment to the Registry Costs in PRC WS 3.1.1

Table 5.3 FY 03 Subclass Volume-Variable Costs by Subgroups of Cost Pools, USPS and PRC Versions - BMCs

BMCs	Distribution operations		Allied operations		Total	
	PRC 1/	USPS	PRC 1/	USPS	PRC 1/	USPS
1--Letters - Single Piece 2/	1,834	1,503	9,978	8,428	11,812	9,932
2--Letters - Presort	4	3	2,276	2,249	2,281	2,252
3--Cards - Single Piece	3	0	370	276	374	276
5--Priority Mail 2/	8,737	7,163	23,396	21,184	32,132	28,347
6--Express Mail	274	225	141	70	415	295
8-1 Periodicals-InCounty	24	20	98	144	122	164
8-2 Periodicals-OutsideC	6,707	5,499	22,007	23,423	28,713	28,921
10--Standard - ECR	4,835	3,963	8,905	7,893	13,741	11,857
11--Standard - Regular	92,180	75,564	215,133	182,174	307,313	257,738
14--Packg S - Parcels	35,027	28,719	90,850	77,524	125,877	106,243
15--Packg S-Bound Print	19,461	15,955	43,137	33,306	62,597	49,261
16--Packg S-Media Mail	19,683	16,138	43,932	35,224	63,615	51,362
18--USPS	11,341	9,297	32,784	28,215	44,125	37,512
19--Free Mail	507	416	2,012	1,609	2,519	2,025
20--International Mail	13,340	10,977	34,927	31,263	48,266	42,240
21--Registered Mail 2/	-		25		25	-
27--Other Spec. Services	0	0	207	304	208	305
Subtotal	213,956	175,443	530,179	453,285	744,135	628,728
Registry Fixed	-		10		10	
Volume-Variable Costs	213,956	175,443	530,169	453,285	744,125	628,728
Volume-Variable Fraction	100%	82%	96%	82%	97%	82%
Total Mail Processing costs	214,147	213,959	552,597	552,788	766,744	766,744

1/ include clocking in/out costs

2/ For the PRC version, these costs represent disaggregated costs for those shown in PRC WS 3.1.1a, however, the Registry costs include the fixed costs shown in the "Registry Fixed" row. These costs do not show reallocated costs from further adjustment to the Registry Costs in PRC WS 3.1.1

Table 1: FY 02 Cost Segment 3 Clerk and Mailhandler Cost Pools

MODS FACILITIES

A. MAIL PROCESSING - PLANTS GROUP 1/

SAS name		Cost Pool Title	Pool Total Costs	Pool Volume-Variable Factor	Pool Volume-Variable Cost
		Automated Equipment			
BCS/	1	BCS - Other than CBCS/DBCS*	187,777	0.73	137,077
BCS/DBCS	2	CBCS / DBCS*	1,096,277	0.89	975,687
OCR/	3	OCR*	245,957	0.87	213,983
		Mechanized, Letters & Flats			
AFSM100	4	AFSM100 - LDC 12 (incl. LDC 15 VCS Flat keying)*	557,111	0.97	540,398
FSM/	5	FSM - Other than FSM 1000 & AFSM100*	114,240	0.97	110,813
FSM/1000	6	FSM 1000*	306,589	0.76	233,008
		Mechanized, Other			
MPLSM		LSM,MPLSM & SPLSM W/BCR	1,024	0.90	922
MECPARC	7	Mechanized Parcels	8,355	0.82	6,851
SPBS OTH	8	SPBS - Non Priority*	418,621	0.73	305,593
SPBSPRIO	9	SPBS - Priority*	106,089	0.73	77,445
1SACKS_M	10	Mechanical Sort - Sack Outside	40,673	0.82	33,352
1TRAYSRT	11	Mechanical Tray Sorter	40,907	0.82	33,544
		Manual Operations			
MANF	12	Manual Flats*	285,772	0.87	248,622
MANL	13	Manual Letters*	1,126,219	0.77	867,189
MANP	14	Manual Parcels*	81,118	0.80	64,894
PRIORITY	15	Manual Priority*	226,411	0.61	138,111
LD15	16	**LDC 15 - RBCS***	206,370	1.00	206,370
		Allied Operations			
1CANCEL	17	Cancellation*	285,538	0.72	205,587
1DSPATCH	18	Dispatch	223,237	0.82	183,054
1FLATPRP	19	Flats Preparation	207,464	0.82	170,120
1MTRPREP	20	Mail Preparation - metered*	39,472	0.70	27,630
1OPBULK	21	Opening Unit - BBM	245,754	0.82	201,518
1OPPREF	22	Opening Unit - Preferred Mail	551,567	0.82	452,285
1OPTRANS	23	Opening - Manual transport	98,411	0.82	80,697
1PLATFRM	24	Platform	1,237,259	0.82	1,014,552
1POUCHNG	25	Pouching Operations	135,719	0.82	111,290
1PRESORT	26	Presort	15,726	0.82	12,895
1SACKS_H	27	Manual Sort - Sack Outside	139,308	0.82	114,233
1SCAN	28	Air Contract DCS and Incoming/SWYB	42,431	0.82	34,793
1SWYB		Scan Where You band	57,309	0.82	46,993
		Other Operations			
BUSREPLY	29	Business Reply / Postage Due	35,168	0.82	28,838
EXPRESS	30	Express Mail	91,663	0.82	75,164
MAILGRAM	31	Mailgram	69	0.82	57
REGISTRY	32	Registry 4/	142,815	0.38	54,270
REWRAP	33	Damaged Parcel Rewrap	13,983	0.82	11,466
1EEQMT	34	Empty Equipment	27,921	0.82	22,895
1MISC	35	Miscellaneous Activity 2/	170,165	0.82	139,535
1SUPPORT	36	Mail Processing Support 2/	205,157	0.82	168,229
LD49	37	LDC 49 - Computerized Forwarding Syst.	278,589	0.82	228,443
LD79	38	LDC 79 - Mailing Req' & Bus. Mail Entry	161,407	0.82	132,354
INTL ISC	39	**ISCs (International Service Centers)**	156,481	0.82	128,314
PMPC	40	**PMPCs (Priority Mail Processing Centers)**	121,537	0.82	99,660
		MAIL PROCESSING TOTAL FOR PLANTS	**9,733,660**	**0.82**	**7,938,730**

Footnotes

* Econometrically derived volume-variability factors

** Volume-variable fraction is based on IOCS classification of 'fixed' activities in the cost poo

1/ This group includes PMPCS, ISCs, LDC 11-15, 17-18, 49,79 for MODS 1&2 Facilities

2/ These support cost pools are combined into the piggyback cost pool 1SUPP_F1

Table 1: FY 02 Cost Segment 3 Clerk and Mailhandler Cost Pools

SAS name		Cost Pool Title	Pool Total	Pool Volume-	Pool Volume-
	A1	**MODS LDC 41-44,48**			
LD41		LDC 41 - Unit Distribution - Automated	29,829	0.82	24,460
LD42		LDC 42 - Unit Distribution - Mechanized	326	0.82	267
LD43		LDC 43 - Unit Distribution - Manual	645,084	0.82	528,969
LD44		LDC 44 - Post-Office Box Distribution	148,975	0.82	122,160
LD48 EXP		LDC 48 - Customer Service / Express	7,506	0.82	6,155
LD48 OTH		LDC 48 - Customer Service / Other	165,188	0.82	135,454
LD48_ADM		LDC 48 - Customer Service / Admin	173,767	0.82	142,489
LD48_SSV		LDC 48 - Customer Service / Spec Servc 4/	102,548	0.52	53,325
		Subtotal Function 4	1,273,223	0.80	1,013,278
		TOTAL MODS 1&2 FACILITIES	**11,006,883**	0.81	**8,952,009**
	B.	**MAIL PROCESSING - non-MODS** 1/			
ALLIED	41	Allied	671,764	0.82	550,846
AUTO/MECH	42	Automated/Mechanized	213,480	0.82	175,054
EXPRESS	43	Express Mail	23,740	0.82	19,467
MANF	44	Manual Flat	478,164	0.82	392,094
MANL	45	Manual Letter	705,813	0.82	578,767
MANP	46	Manual Parcel	201,705	0.82	165,398
MISC	47	Miscellaneous	335,848	0.82	275,395
REGISTRY	48	Registry 4/	42,185	0.28	11,812
		MAIL PROC TOTAL FOR nonMODS 2/	**2,672,699**	**0.81**	**2,168,833**
	C.	**MAIL PROCESSING - BMCs GROUP**			
NMO	49	Non-Machinable Outside (NMO)	40,334	0.82	33,074
OTHR	50	Allied Labor & all other Mail Processing	309,528	0.82	253,813
PLA	51	Platform	210,302	0.82	172,448
PSM	52	Parcel Sorting Machine	78,666	0.82	64,506
SPB	53	SPBS & Irregular Parcels (IPP & 115)	76,553	0.82	62,773
SSM	54	Sack Sorting Machine	26,453	0.82	21,691
		MAIL PROCESSING TOTAL FOR BMCs 2/	**741,836**	0.82	**608,306**
		TOTAL MAIL PROCESSING FOR COST SEGMENT 3	***14,421,418***	***0.81***	***11,729,148***
	D.	**ADMINISTRATIVE AND WINDOW SERVICES**			
		MODS 1&2 Facilities			
		LDC 45 - Window Service	783,212		
		Claims & Inquiries	19,612		
		Administrative Services 5/	701,922		
			1,504,746		
		non-MODs			
		Window Service	1,501,646		
		Claims & Inquiries	13,279		
		Administrative Services	485,218		
			2,000,143		
		BMCs			
		Window Service	991		
		Claims & Inquiries	2,522		
		Administrative Services	76,543		
			80,056		
		TOTAL ADMINISTRATIVE & WINDOW SERVICES FOR C/S 3	***3,584,945***		
		LDC 24 (comp3.4) 3/	16,459		
		TOTAL CLERK AND MAILHANDLER COSTS FOR COST SEGMENT 3	**18,022,822**		

Footnotes
2/ The mail processing cost pools include their portion of the clocking in/out (actv=6522) costs
3/ total used in C/S 3.4
4/ The volume-variable fraction is based on tOCS classification of 'fixed' activities

5/ The non-mail processing portion of the clocking in/out costs are included in the Administrative Services

Table 2: Proportion of Dollar-Weighted Tallies
by Handling ("direct" and "mixed") and Not-Handling Categories
for MODS, nonMODS, and BMCs

Tally Category	Percentage of Dollar-Weighted Tallies			
	BMCs	**MODS**	**nonMODs**	**Total**
Direct Tallies				
Pieces	21.29%	28.39%	45.01%	31.00%
Items	9.52%	10.79%	12.67%	11.06%
Containers	0.77%	0.35%	0.19%	0.34%
Total Direct	31.58%	39.53%	57.87%	42.40%
Mixed Tallies				
Mixed Item Tallies				
Uncounted Item	0.91%	0.42%	0.22%	0.41%
Empty Item	3.08%	2.59%	1.85%	2.48%
Total Item	3.99%	3.01%	2.07%	2.89%
Mixed Container Tallies				
Identified Container				
Loose Pieces	6.16%	2.06%	2.45%	2.34%
Items	2.70%	4.18%	2.60%	3.82%
Subtotal	8.86%	6.24%	5.05%	6.16%
Unidentified Container	0.43%	0.13%	0.13%	0.15%
Empty Container	6.56%	4.60%	3.58%	4.52%
Total Container	15.85%	10.97%	8.76%	10.83%
Total Mixed	19.84%	13.98%	10.83%	13.72%
Not-Handling Tallies	48.58%	46.49%	31.30%	43.88%
TOTAL	100.00%	100.00%	100.00%	100.00%

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 11 BCS/	MODS 11 BCS/DBCS	MODS 11 OCR/	MODS 12 AFSM100	MODS 12 FSM/	MODS 12 FSM/1000	MODS 13 MECPARC
1--Letters - Single Piece							
Vol-Var Costs	62008	464686	130868	220034	45780	106907	503.01
Col. Pct	45.24	47.63	61.16	40.72	41.31	45.88	7.34
2--Letters - Presort							
Vol-Var Costs	31516	263312	33420	29797	7216.5	10038	94.982
Col. Pct	22.99	26.99	15.62	5.51	6.51	4.31	1.39
3--Cards - Single Piece							
Vol-Var Costs	1836.2	11293	7948.2	31.959	100.53	196.5	8.9402
Col. Pct	1.34	1.16	3.71	0.01	0.09	0.08	0.13
4--Cards - Presort							
Vol-Var Costs	855.5	5333.9	1483	111.25	0.1725	0.3128	2.6602
Col. Pct	0.62	0.55	0.69	0.02	0	0	0.04
5--Priority Mail							
Vol-Var Costs	601.62	1414.4	209.96	5710.3	1622.4	4220	2049.6
Col. Pct	0.44	0.14	0.1	1.06	1.46	1.81	29.91
6--Express Mail							
Vol-Var Costs	155.13	130.53	123.26	64.458	35.497	17.693	3.8288
Col. Pct	0.11	0.01	0.06	0.01	0.03	0.01	0.06
8-1 Periodicals-InCounty							
Vol-Var Costs	0.061	0.1443	0.5149	387.76	2.6222	204.81	0.7551
Col. Pct	0	0	0	0.07	0	0.09	0.01
8-2 Periodicals-OutsideC							
Vol-Var Costs	1195.1	1160.9	623.67	53756	9799.4	30418	39.442
Col. Pct	0.87	0.12	0.29	9.95	8.84	13.05	0.58
10--Standard - ECR							
Vol-Var Costs	1123.6	8169.2	2250.5	7462.6	830.64	3841.7	194.1
Col. Pct	0.82	0.84	1.05	1.38	0.75	1.65	2.83
11--Standard - Regular							
Vol-Var Costs	36446	213642	35093	208709	43112	69490	1379.2
Col. Pct	26.59	21.9	16.4	38.62	38.91	29.82	20.13
14--Packg S - Parcels							
Vol-Var Costs	76.267	188.86	14.064	685.64	19.308	176.54	1576
Col. Pct	0.06	0.02	0.01	0.13	0.02	0.08	23
15--Packg S-Bound Print							
Vol-Var Costs	0	268.43	1.8033	3955.5	454.96	1800.7	334.67
Col. Pct	0	0.03	0	0.73	0.41	0.77	4.88
16--Packg S-Media Mail							
Vol-Var Costs	0.0439	1.6625	0.8872	1141.9	2.0412	561.08	300.6
Col. Pct	0	0	0	0.21	0	0.24	4.39
18--USPS							
Vol-Var Costs	202.67	2090.9	771.29	3940.2	705.1	1956.2	347.98
Col. Pct	0.15	0.21	0.36	0.73	0.64	0.84	5.08
19--Free Mail							
Vol-Var Costs	0	0.0915	0.0899	334.89	0.2828	200.62	0.5164
Col. Pct	0	0	0	0.06	0	0.09	0.01
20--International Mail							
Vol-Var Costs	914.81	3333.9	866.26	4184	1119.1	2888.6	12.875
Col. Pct	0.67	0.34	0.4	0.77	1.01	1.24	0.19

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class		MODS 11 BCS/	MODS 11 BCS/DBCS	MODS 11 OCR/	MODS 12 AFSM100	MODS 12 FSM/	MODS 12 FSM/1000	MODS 13 MECPARC
21--Registered Mail								
	Vol-Var Costs	2.7397	68.336	20.142	91.409	11.226	16.174	0.421
	Col. Pct	0	0.01	0.01	0.02	0.01	0.01	0.01
22--Certified Mail								
	Vol-Var Costs	2.7536	0.0346	9.2894	0	0.0182	0.1994	0.4888
	Col. Pct	0	0	0	0	0	0	0.01
23--Insured Mail								
	Vol-Var Costs	0	0.0033	0	0	0	0.0529	0.0347
	Col. Pct	0	0	0	0	0	0	0
24--COD								
	Vol-Var Costs	0	0.0025	0	0	0	0.0009	0.0006
	Col. Pct	0	0	0	0	0	0	0
24-1MONEY ORDERS								
	Vol-Var Costs	0	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0	0
24-2STAMPED ENV								
	Vol-Var Costs	0	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0	0
25--Special Handling								
	Vol-Var Costs	0.7011	0.6473	0.0074	0	0.2817	0.1238	0.0932
	Col. Pct	0	0	0	0	0	0	0
25-1P.O. BOX								
	Vol-Var Costs	0	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0	0
26--Other Spec. Services								
	Vol-Var Costs	139.93	592.3	279.03	0	0.0853	72.455	1.4159
	Col. Pct	0.1	0.06	0.13	0	0	0.03	0.02
Total		137077	975687	213983	540398	110813	233007	6851.5

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 13 MPLSM	MODS 13 SPBS OTH	MODS 13 SPBSPRIO	MODS 13 1SACKS_M	MODS 13 1TRAYSRT	MODS 14 MANF
1--Letters - Single Piece						
Vol-Var Costs	464.58	64361	10910	3813.4	11594	107507
Col. Pct	50.42	21.06	14.09	11.43	34.56	43.24
2--Letters - Presort						
Vol-Var Costs	329.97	7078	552.17	2460.3	9550.1	14322
Col. Pct	35.81	2.32	0.71	7.38	28.47	5.76
3--Cards - Single Piece						
Vol-Var Costs	2.6515	338.42	4.8973	0	4.6427	762.33
Col. Pct	0.29	0.11	0.01	0	0.01	0.31
4--Cards - Presort						
Vol-Var Costs	0.7037	235.85	0.8662	0.2072	0.7721	151.53
Col. Pct	0.08	0.08	0	0	0	0.06
5--Priority Mail						
Vol-Var Costs	2.7345	17713	52783	4524.3	355.79	6737.7
Col. Pct	0.3	5.8	68.16	13.57	1.06	2.71
6--Express Mail						
Vol-Var Costs	0.2062	208.7	7.9972	87.957	25.162	411.7
Col. Pct	0.02	0.07	0.01	0.26	0.08	0.17
8-1 Periodicals-InCounty						
Vol-Var Costs	0.0338	651.48	287.47	45.354	17.36	1154.8
Col. Pct	0	0.21	0.37	0.14	0.05	0.46
8-2 Periodicals-OutsideC						
Vol-Var Costs	6.9302	49679	1866.3	7696.2	1264.2	43265
Col. Pct	0.75	16.26	2.41	23.08	3.77	17.4
10--Standard - ECR						
Vol-Var Costs	2.8863	23122	852.66	3094.6	439.58	4750.2
Col. Pct	0.31	7.57	1.1	9.28	1.31	1.91
11--Standard - Regular						
Vol-Var Costs	47.02	117206	3776.4	7543.2	10047	59926
Col. Pct	5.1	38.35	4.88	22.62	29.95	24.1
14--Packg S - Parcels						
Vol-Var Costs	0.1511	4169.3	1146.5	1535.8	76.051	423.9
Col. Pct	0.02	1.36	1.48	4.6	0.23	0.17
15--Packg S-Bound Print						
Vol-Var Costs	0.4004	8626.8	238.92	1607.2	43.565	1680
Col. Pct	0.04	2.82	0.31	4.82	0.13	0.68
16--Packg S-Media Mail						
Vol-Var Costs	0.2259	4843.5	1019.7	311.38	21.607	466.01
Col. Pct	0.02	1.58	1.32	0.93	0.06	0.19
18--USPS						
Vol-Var Costs	60.227	3539.1	2863.9	609.5	38.688	4105.2
Col. Pct	6.54	1.16	3.7	1.83	0.12	1.65
19--Free Mail						
Vol-Var Costs	0.0291	1306	253.11	0	2.4607	86.58
Col. Pct	0	0.43	0.33	0	0.01	0.03
20--International Mail						
Vol-Var Costs	2.1604	2117	856.65	13.016	40.787	2556.2
Col. Pct	0.23	0.69	1.11	0.04	0.12	1.03

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class		MODS 13 MPLSM	MODS 13 SPBS OTH	MODS 13 SPBSPRIO	MODS 13 1SACKS_M	MODS 13 1TRAYSRT	MODS 14 MANF
21--Registered Mail							
	Vol-Var Costs	0.0302	37.091	21.993	8.1088	15.042	39.981
	Col. Pct	0	0.01	0.03	0.02	0.04	0.02
22--Certified Mail							
	Vol-Var Costs	0.1218	0	0.6426	0	1.1073	3.3837
	Col. Pct	0.01	0	0	0	0	0
23--Insured Mail							
	Vol-Var Costs	0	0	0.028	0	1.0783	0
	Col. Pct	0	0	0	0	0	0
24--COD							
	Vol-Var Costs	0	0	0.0118	0	0.5481	0
	Col. Pct	0	0	0	0	0	0
24-1MONEY ORDERS							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
24-2STAMPED ENV							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
25--Special Handling							
	Vol-Var Costs	0	361.62	0.0113	1.2132	2.2051	0
	Col. Pct	0	0.12	0	0	0.01	0
25-1P.O. BOX							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
26--Other Spec. Services							
	Vol-Var Costs	0.4245	0	1.5795	0	1.358	272.34
	Col. Pct	0.05	0	0	0	0	0.11
Total		921.49	305593	77444.8	33351.8	33543.2	248621

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 14 MANL	MODS 14 MANP	MODS 14 PRIORITY	MODS 15 LD15	MODS 17 1CANCEL	MODS 17 1DSPATCH
1--Letters - Single Piece						
Vol-Var Costs	522945	10879	9657.4	148391	172316	84843
Col. Pct	60.3	16.76	6.99	71.91	83.82	46.35
2--Letters - Presort						
Vol-Var Costs	110444	1858.6	1136.4	25575	5362.2	23845
Col. Pct	12.74	2.86	0.82	12.39	2.61	13.03
3--Cards - Single Piece						
Vol-Var Costs	50099	68.347	508.62	3543.8	4286.2	1514.2
Col. Pct	5.78	0.11	0.37	1.72	2.08	0.83
4--Cards - Presort						
Vol-Var Costs	7928.5	13.874	0.4716	126.33	206.35	301.98
Col. Pct	0.91	0.02	0	0.06	0.1	0.16
5--Priority Mail						
Vol-Var Costs	5769.2	18282	110887	1910.1	7027.7	8643.4
Col. Pct	0.67	28.17	80.29	0.93	3.42	4.72
6--Express Mail						
Vol-Var Costs	1057.1	586.7	1116.2	0	332.97	634.54
Col. Pct	0.12	0.9	0.81	0	0.16	0.35
8-1 Periodicals-InCounty						
Vol-Var Costs	277.51	88.828	3.9066	0	5.8708	352.89
Col. Pct	0.03	0.14	0	0	0	0.19
8-2 Periodicals-OutsideC						
Vol-Var Costs	8078.2	2265.9	673.91	1708.7	1671.8	14298
Col. Pct	0.93	3.49	0.49	0.83	0.81	7.81
10--Standard - ECR						
Vol-Var Costs	4196.3	1171.8	83.2	953.8	1836.2	4584.9
Col. Pct	0.48	1.81	0.06	0.46	0.89	2.5
11--Standard - Regular						
Vol-Var Costs	134207	10043	1977.3	15984	6991.4	33737
Col. Pct	15.48	15.48	1.43	7.75	3.4	18.43
14--Packg S - Parcels						
Vol-Var Costs	715.45	9510.2	1046.7	0	823.54	4302
Col. Pct	0.08	14.65	0.76	0	0.4	2.35
15--Packg S-Bound Print						
Vol-Var Costs	183.33	1779.6	123.75	194.49	155.82	872.88
Col. Pct	0.02	2.74	0.09	0.09	0.08	0.48
16--Packg S-Media Mail						
Vol-Var Costs	254.26	3206.9	3.767	0	1168	1223
Col. Pct	0.03	4.94	0	0	0.57	0.67
18--USPS						
Vol-Var Costs	7454.5	2849.3	8294.2	765.12	1522.6	2407.1
Col. Pct	0.86	4.39	6.01	0.37	0.74	1.31
19--Free Mail						
Vol-Var Costs	141.07	279.89	100.9	0	2.1214	72.777
Col. Pct	0.02	0.43	0.07	0	0	0.04
20--International Mail						
Vol-Var Costs	10983	1950.5	2455.1	7023.3	1676.4	1404.8
Col. Pct	1.27	3.01	1.78	3.4	0.82	0.77

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class		MODS 14 MANL	MODS 14 MANP	MODS 14 PRIORITY	MODS 15 LD15	MODS 17 1CANCEL	MODS 17 1DSPATCH
21--Registered Mail							
	Vol-Var Costs	35.016	53.154	42.005	0	30.587	15.502
	Col. Pct	0	0.08	0.03	0	0.01	0.01
22--Certified Mail							
	Vol-Var Costs	4.0174	0	0	0	17.593	0
	Col. Pct	0	0	0	0	0.01	0
23--Insured Mail							
	Vol-Var Costs	0.0077	0	0	0	0.008	0
	Col. Pct	0	0	0	0	0	0
24--COD							
	Vol-Var Costs	0.0058	0	0	0	0.0061	0
	Col. Pct	0	0	0	0	0	0
24-1MONEY ORDERS							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
24-2STAMPED ENV							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
25--Special Handling							
	Vol-Var Costs	359.89	1.5641	0	0	3.7996	0
	Col. Pct	0.04	0	0	0	0	0
25-1P.O. BOX							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
26--Other Spec. Services							
	Vol-Var Costs	2056.7	4.8383	0	194.49	149.54	0.4205
	Col. Pct	0.24	0.01	0	0.09	0.07	0
Total		867189	64894.6	138111	206370	205587	183054

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM
1--Letters - Single Piece						
Vol-Var Costs	23693	20229	29268	171277	35080	388856
Col. Pct	13.93	73.21	14.52	37.87	43.47	38.33
2--Letters - Presort						
Vol-Var Costs	6191.1	2998.7	10996	72410	12004	110095
Col. Pct	3.64	10.85	5.46	16.01	14.88	10.85
3--Cards - Single Piece						
Vol-Var Costs	234.9	457	487.03	4839.8	511.64	11846
Col. Pct	0.14	1.65	0.24	1.07	0.63	1.17
4--Cards - Presort						
Vol-Var Costs	0	0.2831	113.6	1910.8	570.41	2761.8
Col. Pct	0	0	0.06	0.42	0.71	0.27
5--Priority Mail						
Vol-Var Costs	1352.8	1110.4	5981.5	27590	2189.9	93191
Col. Pct	0.8	4.02	2.97	6.1	2.71	9.19
6--Express Mail						
Vol-Var Costs	0	1.7531	271.55	3264.8	329.85	11402
Col. Pct	0	0.01	0.13	0.72	0.41	1.12
8-1 Periodicals-InCounty						
Vol-Var Costs	126.56	0.3329	140.5	1383.2	39.723	968.2
Col. Pct	0.07	0	0.07	0.31	0.05	0.1
8-2 Periodicals-OutsideC						
Vol-Var Costs	30859	178.34	12139	47239	6496.1	68586
Col. Pct	18.14	0.65	6.02	10.44	8.05	6.76
10--Standard - ECR						
Vol-Var Costs	5130.2	23.353	12712	8826.9	1725.1	25379
Col. Pct	3.02	0.08	6.31	1.95	2.14	2.5
11--Standard - Regular						
Vol-Var Costs	97926	1900	122047	91268	19882	224679
Col. Pct	57.56	6.88	60.56	20.18	24.64	22.15
14--Packg S - Parcels						
Vol-Var Costs	110.68	99.202	2306	6322.2	351.4	23155
Col. Pct	0.07	0.36	1.14	1.4	0.44	2.28
15--Packg S-Bound Print						
Vol-Var Costs	1439.1	4.7493	2877.6	5457.3	128.59	9353
Col. Pct	0.85	0.02	1.43	1.21	0.16	0.92
16--Packg S-Media Mail						
Vol-Var Costs	242.19	94.024	1012.4	1208.6	73.745	5585.3
Col. Pct	0.14	0.34	0.5	0.27	0.09	0.55
18--USPS						
Vol-Var Costs	872.66	139.92	847.83	5267.2	463.85	16598
Col. Pct	0.51	0.51	0.42	1.16	0.57	1.64
19--Free Mail						
Vol-Var Costs	0	0.0933	143.1	303.77	8.1314	992.58
Col. Pct	0	0	0.07	0.07	0.01	0.1
20--International Mail						
Vol-Var Costs	1939.7	377.28	160.17	3718.1	615.35	19915
Col. Pct	1.14	1.37	0.08	0.82	0.76	1.96

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class		MODS 17 1FLATPRP	MODS 17 1MTRPREP	MODS 17 1OPBULK	MODS 17 1OPPREF	MODS 17 1OPTRANS	MODS 17 1PLATFRM
21--Registered Mail							
	Vol-Var Costs	1.1849	16.22	15.542	0	60.457	137.36
	Col. Pct	0	0.06	0.01	0	0.07	0.01
22--Certified Mail							
	Vol-Var Costs	1.5727	0.0948	0	0	0	8.6451
	Col. Pct	0	0	0	0	0	0
23--Insured Mail							
	Vol-Var Costs	0	0.0028	0	0	0	0.1915
	Col. Pct	0	0	0	0	0	0
24--COD							
	Vol-Var Costs	0	0.0021	0	0	0	0.0299
	Col. Pct	0	0	0	0	0	0
24-1MONEY ORDERS							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
24-2STAMPED ENV							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
25--Special Handling							
	Vol-Var Costs	0	0.0134	0	0	2.652	379.65
	Col. Pct	0	0	0	0	0	0.04
25-1P.O. BOX							
	Vol-Var Costs	0	0	0	0	0	0
	Col. Pct	0	0	0	0	0	0
26--Other Spec. Services							
	Vol-Var Costs	0	0.1141	0	0	163.7	663.71
	Col. Pct	0	0	0	0	0.2	0.07
Total		170120	27630.4	201519	452286	80696.9	1014553

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	MODS 17 1SWYB	MODS 18 BUSREPLY
1--Letters - Single Piece						
Vol-Var Costs	46188	2343.3	17964	13702	14668	9055.9
Col. Pct	41.5	18.17	15.73	39.38	31.21	31.4
2--Letters - Presort						
Vol-Var Costs	9123.8	6396.5	8635.6	5368.5	5881.4	915.64
Col. Pct	8.2	49.6	7.56	15.43	12.52	3.18
3--Cards - Single Piece						
Vol-Var Costs	621.01	9.3823	38.276	719.54	5.5371	323.98
Col. Pct	0.56	0.07	0.03	2.07	0.01	1.12
4--Cards - Presort						
Vol-Var Costs	208.4	206.61	4.3366	0.3263	422.6	0.4349
Col. Pct	0.19	1.6	0	0	0.9	0
5--Priority Mail						
Vol-Var Costs	9777	292.74	13333	6507.2	18342	1169.8
Col. Pct	8.79	2.27	11.67	18.7	39.03	4.06
6--Express Mail						
Vol-Var Costs	685.76	1.9588	1352.2	2797.6	2543.1	97.216
Col. Pct	0.62	0.02	1.18	8.04	5.41	0.34
8-1 Periodicals-InCounty						
Vol-Var Costs	244.83	153.9	250.58	9.9136	0.1356	0.6804
Col. Pct	0.22	1.19	0.22	0.03	0	0
8-2 Periodicals-OutsideC						
Vol-Var Costs	12318	257.14	19648	528.88	104.44	22.286
Col. Pct	11.07	1.99	17.2	1.52	0.22	0.08
10--Standard - ECR						
Vol-Var Costs	2953	484.35	5735.6	209.28	13.774	170.73
Col. Pct	2.65	3.76	5.02	0.6	0.03	0.59
11--Standard - Regular						
Vol-Var Costs	18614	2561.3	32852	2888.8	2106.3	760.7
Col. Pct	16.73	19.86	28.76	8.3	4.48	2.64
14--Packg S - Parcels						
Vol-Var Costs	2271.4	9.8456	7541.8	5.792	221.53	773.32
Col. Pct	2.04	0.08	6.6	0.02	0.47	2.68
15--Packg S-Bound Print						
Vol-Var Costs	815.95	0.3745	681.11	1.2485	0.504	4.6745
Col. Pct	0.73	0	0.6	0	0	0.02
16--Packg S-Media Mail						
Vol-Var Costs	1196.4	0.3904	1087.9	0.3462	0.5418	3.3491
Col. Pct	1.08	0	0.95	0	0	0.01
18--USPS						
Vol-Var Costs	2354	150.73	2333.9	752.09	1250.1	2379.9
Col. Pct	2.12	1.17	2.04	2.16	2.66	8.25
19--Free Mail						
Vol-Var Costs	351.02	0.0435	0.0271	0.0311	0.5688	0.2025
Col. Pct	0.32	0	0	0	0	0
20--International Mail						
Vol-Var Costs	3358.5	4.7241	2703.4	537.37	1232.1	411.07
Col. Pct	3.02	0.04	2.37	1.54	2.62	1.43

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 17 1POUCHNG	MODS 17 1PRESORT	MODS 17 1SACKS_H	MODS 17 1SCAN	MODS 17 1SWYB	MODS 18 BUSREPLY
21--Registered Mail						
Vol-Var Costs	183.37	20.551	65.005	6.2541	7.0823	6.9726
Col. Pct	0.16	0.16	0.06	0.02	0.02	0.02
22--Certified Mail						
Vol-Var Costs	0	0.5452	4.7676	1.0957	0.2705	0.5216
Col. Pct	0	0	0	0	0	0
23--Insured Mail						
Vol-Var Costs	0	0.0266	0	0.0105	0.0118	0.0255
Col. Pct	0	0	0	0	0	0
24--COD						
Vol-Var Costs	0	0	0	0.0045	0.005	0
Col. Pct	0	0	0	0	0	0
24-1MONEY ORDERS						
Vol-Var Costs	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0
24-2STAMPED ENV						
Vol-Var Costs	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0
25--Special Handling						
Vol-Var Costs	25.553	0.4333	0.0022	1.1754	193.11	0.5409
Col. Pct	0.02	0	0	0	0.41	0
25-1P.O. BOX						
Vol-Var Costs	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0
26--Other Spec. Services						
Vol-Var Costs	0.1059	0.4474	1.7663	755.77	0.9175	12740
Col. Pct	0	0	0	2.17	0	44.18
Total	111290	12895.3	114233	34793.2	46993.3	28838

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 18 EXPRESS	MODS 18 MAILGRAM	MODS 18 REGISTRY	MODS 18 REWRAP	MODS 18 1EEQMT	MODS 19 INTL ISC
1--Letters - Single Piece						
Vol-Var Costs	3657.9	29.17	3762.1	6626.9	6792.4	9348.8
Col. Pct	4.87	51.74	6.93	57.8	29.67	7.29
2--Letters - Presort						
Vol-Var Costs	1402.5	0	161.09	431.35	3647.6	2846
Col. Pct	1.87	0	0.3	3.76	15.93	2.22
3--Cards - Single Piece						
Vol-Var Costs	23.036	0	266.39	99.545	215.04	219.61
Col. Pct	0.03	0	0.49	0.87	0.94	0.17
4--Cards - Presort						
Vol-Var Costs	0.6375	0	0.055	0.7897	48.059	0
Col. Pct	0	0	0	0.01	0.21	0
5--Priority Mail						
Vol-Var Costs	2586.4	0	682.25	1188.6	1870.2	6695.9
Col. Pct	3.44	0	1.26	10.37	8.17	5.22
6--Express Mail						
Vol-Var Costs	56052	0	1083.5	18.364	336.46	3340.5
Col. Pct	74.57	0	2	0.16	1.47	2.6
8-1 Periodicals-InCounty						
Vol-Var Costs	0.9654	0	10.157	4.5291	24.942	6.9637
Col. Pct	0	0	0.02	0.04	0.11	0.01
8-2 Periodicals-OutsideC						
Vol-Var Costs	403.17	0	439.35	750.65	1252	1150.2
Col. Pct	0.54	0	0.81	6.55	5.47	0.9
10--Standard - ECR						
Vol-Var Costs	81.613	0	253.1	45.572	1295.7	277.32
Col. Pct	0.11	0	0.47	0.4	5.66	0.22
11--Standard - Regular						
Vol-Var Costs	1428.5	0	1086.1	1462.6	5804.3	2020.6
Col. Pct	1.9	0	2	12.76	25.35	1.57
14--Packg S - Parcels						
Vol-Var Costs	30.727	0	185.99	12.678	278.1	802.63
Col. Pct	0.04	0	0.34	0.11	1.21	0.63
15--Packg S-Bound Print						
Vol-Var Costs	5.3422	0	58.596	1.4011	134.56	205.65
Col. Pct	0.01	0	0.11	0.01	0.59	0.16
16--Packg S-Media Mail						
Vol-Var Costs	3.936	0	34.763	106.23	91.611	157.98
Col. Pct	0.01	0	0.06	0.93	0.4	0.12
18--USPS						
Vol-Var Costs	4955.4	27.21	9028.1	562.49	434.78	1063.5
Col. Pct	6.59	48.26	16.64	4.91	1.9	0.83
19--Free Mail						
Vol-Var Costs	10.041	0	2.1828	0.0753	17.879	12.058
Col. Pct	0.01	0	0	0	0.08	0.01
20--International Mail						
Vol-Var Costs	4376.3	0	8814.8	17.466	490.45	99840
Col. Pct	5.82	0	16.24	0.15	2.14	77.81

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 18 EXPRESS	MODS 18 MAILGRAM	MODS 18 REGISTRY	MODS 18 REWRAP	MODS 18 1EEQMT	MODS 19 INTL ISC
21--Registered Mail						
Vol-Var Costs	132.98	0	28272	14.93	123.62	292.33
Col. Pct	0.18	0	52.09	0.13	0.54	0.23
22--Certified Mail						
Vol-Var Costs	0.7646	0	0.0426	7.6424	1.9286	21.891
Col. Pct	0	0	0	0.07	0.01	0.02
23--Insured Mail						
Vol-Var Costs	0.0374	0	0.0442	0.0323	0.6326	0
Col. Pct	0	0	0	0	0	0
24--COD						
Vol-Var Costs	0	0	0	0.0073	0.0043	0
Col. Pct	0	0	0	0	0	0
24-1MONEY ORDERS						
Vol-Var Costs	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0
24-2STAMPED ENV						
Vol-Var Costs	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0
25--Special Handling						
Vol-Var Costs	10.667	0	0.9049	0.7194	9.0994	12.155
Col. Pct	0.01	0	0	0.01	0.04	0.01
25-1P.O. BOX						
Vol-Var Costs	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0
26--Other Spec. Services						
Vol-Var Costs	0.6275	0	128.74	113.17	25.956	0
Col. Pct	0	0	0.24	0.99	0.11	0
Total	75163.4	56.3796	54269.8	11465.7	22895.4	128314

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 19 PMPC	MODS 41 LD41	MODS 42 LD42	MODS 43 LD43	MODS 44 LD44	MODS 48 LD48 EXP	MODS 48 LD48_SSV
1--Letters - Single Piece							
Vol-Var Costs	1174.9	9604.9	92.601	180457	59205	1299.4	15984
Col. Pct	1.18	39.27	34.64	34.11	48.47	21.11	29.98
2--Letters - Presort							
Vol-Var Costs	586.96	6866.4	8.7253	54977	22376	130.6	2841.3
Col. Pct	0.59	28.07	3.26	10.39	18.32	2.12	5.33
3--Cards - Single Piece							
Vol-Var Costs	2.575	203.71	1.5215	7018.6	993.45	2.6847	884.17
Col. Pct	0	0.83	0.57	1.33	0.81	0.04	1.66
4--Cards - Presort							
Vol-Var Costs	0.5026	300.36	0.0372	1347.5	461.82	0.9183	106.19
Col. Pct	0	1.23	0.01	0.25	0.38	0.01	0.2
5--Priority Mail							
Vol-Var Costs	89427	522.37	5.2903	50935	4205.9	198.66	2624.4
Col. Pct	89.73	2.14	1.98	9.63	3.44	3.23	4.92
6--Express Mail							
Vol-Var Costs	4.8955	9.2815	1.1431	2537	955.37	3023.1	4500.8
Col. Pct	0	0.04	0.43	0.48	0.78	49.12	8.44
8-1 Periodicals-InCounty							
Vol-Var Costs	4.914	0.1526	0.04	1138.6	91.947	0.2321	0.0186
Col. Pct	0	0	0.01	0.22	0.08	0	0
8-2 Periodicals-OutsideC							
Vol-Var Costs	432	278.27	5.7808	38102	5115.8	128.29	1175.2
Col. Pct	0.43	1.14	2.16	7.2	4.19	2.08	2.2
10--Standard - ECR							
Vol-Var Costs	75.443	264.2	2.1118	24597	1198.6	118.82	466.72
Col. Pct	0.08	1.08	0.79	4.65	0.98	1.93	0.88
11--Standard - Regular							
Vol-Var Costs	725.62	6258	123.59	121182	23437	660.04	2633.6
Col. Pct	0.73	25.58	46.23	22.91	19.19	10.72	4.94
14--Packg S - Parcels							
Vol-Var Costs	147.49	4.805	1.1826	16910	514.85	325.71	1054.5
Col. Pct	0.15	0.02	0.44	3.2	0.42	5.29	1.98
15--Packg S-Bound Print							
Vol-Var Costs	14.475	1.2743	21.356	7483.8	688.69	2.1969	124.82
Col. Pct	0.01	0.01	7.99	1.41	0.56	0.04	0.23
16--Packg S-Media Mail							
Vol-Var Costs	15.406	0.3039	0.1617	9723.1	273.87	8.3086	87.918
Col. Pct	0.02	0	0.06	1.84	0.22	0.13	0.16
18--USPS							
Vol-Var Costs	5791.3	1.1688	0.5623	7833.1	1496.8	14.13	2183
Col. Pct	5.81	0	0.21	1.48	1.23	0.23	4.09
19--Free Mail							
Vol-Var Costs	0.6016	0	0.0206	474.81	3.7686	23.324	0
Col. Pct	0	0	0.01	0.09	0	0.38	0
20--International Mail							
Vol-Var Costs	1238.7	0.6906	1.0684	3785.7	1017.2	48.837	3831.9
Col. Pct	1.24	0	0.4	0.72	0.83	0.79	7.19

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 19 PMPC	MODS 41 LD41	MODS 42 LD42	MODS 43 LD43	MODS 44 LD44	MODS 48 LD48 EXP	MODS 48 LD48_SSV
21--Registered Mail							
Vol-Var Costs	8.149	3.448	1.9737	8.0558	35.456	142.13	1985.2
Col. Pct	0.01	0.01	0.74	0	0.03	2.31	3.72
22--Certified Mail							
Vol-Var Costs	8.8487	0	0.0619	0	0.1553	0.2189	10632
Col. Pct	0.01	0	0.02	0	0	0	19.94
23--Insured Mail							
Vol-Var Costs	0.0162	0	0.0011	0	0.0701	0.0316	381.67
Col. Pct	0	0	0	0	0	0	0.72
24--COD							
Vol-Var Costs	0.0069	0	0	0	0.0014	0.0192	325.5
Col. Pct	0	0	0	0	0	0	0.61
24-1MONEY ORDERS							
Vol-Var Costs	0	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0	0
24-2STAMPED ENV							
Vol-Var Costs	0	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0	0
25--Special Handling							
Vol-Var Costs	0.0066	140.2	0.0176	0	3.2483	26.893	0
Col. Pct	0	0.57	0.01	0	0	0.44	0
25-1P.O. BOX							
Vol-Var Costs	0	0	0	0	0	0	0
Col. Pct	0	0	0	0	0	0	0
26--Other Spec. Services							
Vol-Var Costs	0.9164	0	0.0942	458.2	84.874	0.4478	1501.8
Col. Pct	0	0	0.04	0.09	0.07	0.01	2.82
Total	99660.2	24459.6	267.342	528969	122160	6155	53324.8

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class	MODS 49 LD49	MODS 79 LD79	MODS 99 1SUPP_F1	MODS 99 1SUPP_F4	Total
1--Letters - Single Piece					
Vol-Var Costs	79758	15651	124637	106033	3574906
Col. Pct	34.91	11.82	40.5	38.15	
2--Letters - Presort					
Vol-Var Costs	65176	26478	35941	34118	1086914
Col. Pct	28.53	20.01	11.68	12.28	
3--Cards - Single Piece					
Vol-Var Costs	6017.8	530.11	4323.8	5353.7	128798
Col. Pct	2.63	0.4	1.4	1.93	
4--Cards - Presort					
Vol-Var Costs	2984.8	1377.7	1013.7	1235.1	31832
Col. Pct	1.31	1.04	0.33	0.44	
5--Priority Mail					
Vol-Var Costs	1478	5146.9	22405	16664	637937
Col. Pct	0.65	3.89	7.28	6	
6--Express Mail					
Vol-Var Costs	15.739	249.21	3693.2	4567.5	108135
Col. Pct	0.01	0.19	1.2	1.64	
8-1 Periodicals-InCounty					
Vol-Var Costs	690.89	576.92	308.91	413.69	10075
Col. Pct	0.3	0.44	0.1	0.15	
8-2 Periodicals-OutsideC					
Vol-Var Costs	30671	5476.3	18200	16358	547780
Col. Pct	13.43	4.14	5.91	5.89	
10--Standard - ECR					
Vol-Var Costs	1929.8	3938.3	5749.5	6470.4	179088
Col. Pct	0.84	2.98	1.87	2.33	
11--Standard - Regular					
Vol-Var Costs	16675	56209	70495	40124	1977166
Col. Pct	7.3	42.47	22.91	14.44	
14--Packg S - Parcels					
Vol-Var Costs	13.126	342.52	2970.7	4861.3	98111
Col. Pct	0.01	0.26	0.97	1.75	
15--Packg S-Bound Print					
Vol-Var Costs	2267.9	1625.9	1876.4	2375.3	59975
Col. Pct	0.99	1.23	0.61	0.85	
16--Packg S-Media Mail					
Vol-Var Costs	259.62	876.49	1094.2	2586.6	40352
Col. Pct	0.11	0.66	0.36	0.93	
18--USPS					
Vol-Var Costs	12880	12249	4658.4	7653	148765
Col. Pct	5.64	9.25	1.51	2.75	
19--Free Mail					
Vol-Var Costs	172.28	0	192.24	148.96	5639.3
Col. Pct	0.08	0	0.06	0.05	
20--International Mail					
Vol-Var Costs	703.32	1602.2	8138.5	3778.2	217057
Col. Pct	0.31	1.21	2.64	1.36	

TABLE 3 : FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - MODS 1and2

Costpool

Mail class		MODS 49 LD49	MODS 79 LD79	MODS 99 1SUPP_F1	MODS 99 1SUPP_F4	Total
21--Registered Mail						
	Vol-Var Costs	25.443	24.244	1243	889.59	34231
	Col. Pct	0.01	0.02	0.4	0.32	
22--Certified Mail						
	Vol-Var Costs	2.214	0	4.0861	5921.9	16659
	Col. Pct	0	0	0	2.13	
23--Insured Mail						
	Vol-Var Costs	0.0139	0	0.0933	2444.3	2828.4
	Col. Pct	0	0	0	0.88	
24--COD						
	Vol-Var Costs	0.0002	0	0.0264	198.69	524.88
	Col. Pct	0	0	0	0.07	
24-1MONEY ORDERS						
	Vol-Var Costs	0	0	0	6447.6	6447.6
	Col. Pct	0	0	0	2.32	
24-2STAMPED ENV						
	Vol-Var Costs	0	0	0	266.47	266.47
	Col. Pct	0	0	0	0.1	
25--Special Handling						
	Vol-Var Costs	105.58	0	56.91	80.195	1781.9
	Col. Pct	0.05	0	0.02	0.03	
25-1P.O. BOX						
	Vol-Var Costs	0	0	0	4385.3	4385.3
	Col. Pct	0	0	0	1.58	
26--Other Spec. Services						
	Vol-Var Costs	6617	0	763.45	4568.1	32357
	Col. Pct	2.9	0	0.25	1.64	
Total		228443	132354	307764	277943	8952010

TABLE 3 : FY 02 MAIL PROCESSING VOLUME-VARIABLE COSTS
(NonMODS Offices)

Mail class	Costpool	ALLIED	AUTOMEC	EXPRESS	MANF	MANL	MANP	MISC	REGISTRY	Total
1--Letters - Single Piece										
	Vol-Var Costs	196443	73456	0	123152	304929	18553	101798	3987.5	822319
	Col Pct	35.66	41.96	0	31.41	52.69	11.22	36.96	33.76	
2--Letters - Presort										
	Vol-Var Costs	68105	52174	0	17828	107967	1484.9	44521	504.37	292584
	Col Pct	12.36	29.8	0	4.55	18.65	0.9	16.17	4.27	
3--Cards - Single Piece										
	Vol-Var Costs	4785.2	3163	0	218.46	20835	0	5899.7	0.9626	34903
	Col Pct	0.87	1.81	0	0.06	3.6	0	2.14	0.01	
4--Cards - Presort										
	Vol-Var Costs	1908.7	764.19	0	96.51	3930.6	0	1244.7	0.4193	7945.1
	Col Pct	0.35	0.44	0	0.02	0.68	0	0.45	0	
5--Priority Mail										
	Vol-Var Costs	34816	312.54	0	13824	1184.1	57440	10378	770.26	118724
	Col Pct	6.32	0.18	0	3.53	0.2	34.73	3.77	6.52	
6--Express Mail										
	Vol-Var Costs	3437	1.9678	13028	743.65	260.15	448.4	3045.4	484.87	21450
	Col Pct	0.62	0	66.93	0.19	0.04	0.27	1.11	4.11	
7--Mailgram										
	Vol-Var Costs	2525.1	0.8032	0	1341.2	698.3	154.27	621.02	91.964	5432.7
	Col Pct	0.46	0	0	0.34	0.12	0.09	0.23	0.78	
8-1 Periodicals-InCounty										
	Vol-Var Costs	38123	2283.1	0	72572	5631.6	702.43	12574	117.07	132003
	Col Pct	6.92	1.3	0	18.51	0.97	0.42	4.57	0.99	
8-2 Periodicals-OutsideC										
	Vol-Var Costs	31533	4078.7	0	20655	6845.1	1615	6058.6	50.323	70835
	Col Pct	5.72	2.33	0	5.27	1.18	0.98	2.2	0.43	
10--Standard - ECR										
	Vol-Var Costs	136697	38516	378.13	132731	120695	33828	45812	258.53	508915
	Col Pct	24.82	22	1.94	33.85	20.85	20.45	16.64	2.19	
11--Standard - Regular										
	Vol-Var Costs	11066	34.577	0	615.02	574.1	27282	3711.5	47.444	43331
	Col Pct	2.01	0.02	0	0.16	0.1	16.49	1.35	0.4	
14--Packg S - Parcels										
	Vol-Var Costs	5532.5	11.574	0	3352.5	386.89	7633.4	2229.2	3.5863	19150
	Col Pct	1	0.01	0	0.86	0.07	4.62	0.81	0.03	
15--Packg S-Bound Print										
	Vol-Var Costs	3578.9	5.603	0	1466.7	210.21	7043.6	1375.3	1.5638	13682
	Col Pct	0.65	0	0	0.37	0.04	4.26	0.5	0.01	
16--Packg S-Media Mail										
	Vol-Var Costs	7667.1	246.36	3069.5	2376.1	2613	6968.2	5601.4	1405.2	29947
	Col Pct	1.39	0.14	15.77	0.61	0.45	4.21	2.03	11.9	
18--USPS										
	Vol-Var Costs	549.79	0.774	0	85.173	183.34	964.19	117.3	0.0867	1900.7
	Col Pct	0.1	0	0	0.02	0.03	0.58	0.04	0	
19--Free Mail										
	Vol-Var Costs	4080.5	2.6551	2991	986.7	1822.7	1281.2	2130.9	1840.5	15136
	Col Pct	0.74	0	15.36	0.25	0.31	0.77	0.77	15.58	
20--International Mail										
	Vol-Var Costs	0	0.0242	0	0	0	0	514.91	0.0738	515.01
	Col Pct	0	0	0	0	0	0	0.19	0	

TABLE 3 : FY 02 MAIL PROCESSING VOLUME-VARIABLE COSTS
(NonMODS Offices)

Mail class	*Costpool* ALLIED	AUTOMEC	EXPRESS	MANF	MANL	MANP	MISC	REGISTRY	Total
21--Registered Mail									
Vol-Var Costs	0	0.7016	0	50.012	0	0	972.31	2244.3	3267.4
Col Pct	0	0	0	0.01	0	0	0.35	19	
22--Certified Mail									
Vol-Var Costs	0	0.4296	0	0.9476	0	0	14831	1.2077	14833
Col Pct	0	0	0	0	0	0	5.39	0.01	
24--COD									
Vol-Var Costs	0	0.0199	0	0	0	0	288.91	0.0857	289.02
Col Pct	0	0	0	0	0	0	0.1	0	
27--Other Spec. Services									
Vol-Var Costs	0	0.5802	0	0.9731	0.173	0	11671	1.2613	11674
Col Pct	0	0	0	0	0	0	4.24	0.01	
Total	550848	175054	19467	392094	578766	165399	275396	11811.7	2168836

TABLE 3: FY02 MAIL PROCESSING VOLUME-VARIABLE COSTS - BMCs

Mail class	*Costpool* NMO	OTHR	PLA	PSM	SPB	SSM	Total
1--Letters - Single Piece							
Vol-Var Costs	430.28	6244.1	3075.8	1014.9	1509.3	255.51	12530
Col. Pct	1.3	2.46	1.78	1.57	2.4	1.18	
2--Letters - Presort							
Vol-Var Costs	0.1679	577.21	268.64	0.9878	199.4	0.2133	1046.6
Col. Pct	0	0.23	0.16	0	0.32	0	
3--Cards - Single Piece							
Vol-Var Costs	0	98.244	16.591	0	0	0	114.83
Col. Pct	0	0.04	0.01	0	0	0	
5--Priority Mail							
Vol-Var Costs	1905.7	6155.8	4919.4	3616.4	634.11	35.286	17267
Col. Pct	5.76	2.43	2.85	5.61	1.01	0.16	
6--Express Mail							
Vol-Var Costs	0.0921	243.38	90.924	0	90.788	0.5178	425.7
Col. Pct	0	0.1	0.05	0	0.14	0	
8-1 Periodicals-InCounty							
Vol-Var Costs	8.6767	75.446	54.458	0.9767	8.0933	18.896	166.55
Col. Pct	0.03	0.03	0.03	0	0.01	0.09	
8-2 Periodicals-OutsideC							
Vol-Var Costs	596.93	11790	7137.1	155.86	2705.3	2806.2	25191
Col. Pct	1.8	4.64	4.14	0.24	4.31	12.94	
10--Standard - ECR							
Vol-Var Costs	187.46	4423	3208.3	200.24	2938.3	510.43	11468
Col. Pct	0.57	1.74	1.86	0.31	4.68	2.35	
11--Standard - Regular							
Vol-Var Costs	5551.2	99315	65669	18813	38765	12991	241104
Col. Pct	16.78	39.13	38.08	29.16	61.75	59.89	
14--Packg S - Parcels							
Vol-Var Costs	17150	44941	37242	11206	3478.9	1714.6	115732
Col. Pct	51.85	17.71	21.6	17.37	5.54	7.9	
15--Packg S-Bound Print							
Vol-Var Costs	884.23	24709	18116	13310	3731.2	691.75	61442
Col. Pct	2.67	9.73	10.51	20.63	5.94	3.19	
16--Packg S-Media Mail							
Vol-Var Costs	1597.9	22194	15670	11374	1950.8	1380.4	54168
Col. Pct	4.83	8.74	9.09	17.63	3.11	6.36	
18--USPS							
Vol-Var Costs	2841.4	14083	7146.2	871.1	3336.5	90.91	28369
Col. Pct	8.59	5.55	4.14	1.35	5.32	0.42	
19--Free Mail							
Vol-Var Costs	355.15	230.53	223.31	57.343	179.24	1.0885	1046.6
Col. Pct	1.07	0.09	0.13	0.09	0.29	0.01	
20--International Mail							
Vol-Var Costs	1564.357	18573.82	9478.37	3885.6	2926.46	1194.898	37623.7
Col. Pct	4.73	7.32	5.5	6.02	4.66	5.51	
27--Other Spec. Services							
Vol-Var Costs	0.1557	161.92	130.62	0	319.98	0.0789	612.75
Col. Pct	0	0.06	0.08	0	0.51	0	
Total							
	33073.8	253815	172447	64505.7	62773.1	21691.5	608306

Table 4. FY 02 IOCS Mail Processing Mixed-Mail Tallies - Clerks/Mailhandlers
Crosswalk of Q.19 actv code to item/container information
Allied Cost Pools - MODS 1&2 Facilties
Exclude Empty Items and Containers
(similar to Table 1 of Degen's Rebuttal Testimony, Docket No. R2000-1, Tr. 38/17324 (Aug 23, 2000)).

	Mixed	Mixed Item/Container Tally Dollar Weights (000)						
Shape	Actv(Q19)	Letters	Flats	Parcels	Class	None	Total	% of Total
Letters	5610	20,456	1,350	33	231	489	22,559	5.4%
Flats	5620	252	18,624	361	114	3,138	22,489	5.4%
Parcels	5700	477	411	5,124	1,390	1,318	8,721	2.1%
None	5750	130,805	85,516	68,551	41,055	36,540	362,467	87.1%
Total		151,990	105,901	74,069	42,790	41,486	416,236	100.0%
% of Total		37%	25%	18%	10%	10%	100%	
% 5750 of Total 5750		36%	24%	19%	11%	10%	100%	
% 5750 w/ shape or class from item/container of total mixed-mail							78%	

Note: This table was created using the FY 2002 IOCS data set. Cost pool assignments are based on the MODS based cost distribution methodology described in Part II. This methodology is also used to classify individual tallies as mixed-mail items, counted mixed mail containers, and uncounted mixed-mail containers. All mixed-mail tallies are then summed by mixed-mail activity code (IOCS filed F9806) and item/container categories based on item and container type. Item type is assigned, based on IOCS field F9214, container type based on IOCS field F9219, and counted container contents based on IOCS field F9901 through F9919 f9420-f9421. Individual item and container types are assigned to the above categories as follows:

Letters <-- loose cards and letters in containers and letter trays
Flats <-- loose flats in containers and flat trays
Parcels <-- loose IPP's and parcels in containers and small parcel trays
Class <-- all sacks (individual items and in counted containers)
None <-- all remaining items and container types.

Table 5: FY 02 C/S 3 Mail Processing Costs and Volume-Variabilities by Cost Pool - PRC Version

MODS FACILITIES

A. MAIL PROCESSING - PLANTS GROUP

SAS name		Cost Pool Title	USPS Pool Total Costs	PRC Mail Proc Pool costs (exclude 'migrated')	PRC Mail Proc Vol.Var. Costs (i.e. exclude 'fixed')	PRC Pool Volume-Variable Factor
		Automated Equipment				
BCS/	1	BCS - Other than CBCS/DBCS	187,777	184,956	184,206	0.9959
BCS/DBCS	2	CBCS / DBCS	1,096,277	1,078,684	1,076,472	0.9979
OCR/	3	OCR*	245,957	242,006	240,945	0.9956
		Mechanized, Letters & Flats				
AFSM100	4	AFSM100 - LDC 12 (incl. LDC 15 VCS Flat keyi	557,111	544,898	542,761	0.9961
FSM/	5	FSM - Other than FSM 1000 & AFSM100	114,240	111,343	110,789	0.9950
FSM/100C	6	FSM 1000	306,589	300,710	299,105	0.9947
		Mechanized, Other				
MECPAR(	7	Mechanized Parcels	8,355	8,091	8,009	0.9899
MPLSM		LSM, MPLSM	1,024	762	762	1.0000
SPBS OTI	8	SPBS - Non Priority	418,621	410,494	407,731	0.9933
SPBSPRI(	9	SPBS - Priority	106,089	103,935	103,254	0.9935
1SACKS_	10	Mechanical Sort - Sack Outside	40,673	39,669	38,660	0.9746
1TRAYSR	11	Mechanical Tray Sorter	40,907	39,416	39,117	0.9924
		Manual Operations				
MANF	12	Manual Flats	285,772	280,159	278,703	0.9948
MANL	13	Manual Letters	1,126,219	1,103,437	1,096,535	0.9937
MANP	14	Manual Parcels	81,118	79,231	78,589	0.9919
PRIORITY	15	Manual Priority	226,411	220,111	219,020	0.9950
LD15	16	**LDC 15 - RBCS**	206370	206370	206370	1.0000
		Allied Operations				
1CANCEL	17	Cancellation	285,538	277,976	273,604	0.9843
1DSPATC	18	Dispatch	223,237	216,666	212,367	0.9802
1FLATPR	19	Flats Preparation	207,464	201,613	200,173	0.9929
1MTRPRE	20	Mail Preparation - metered	39,472	37,829	37,360	0.9876
1OPBULK	21	Opening Unit - BBM	245,754	240,073	237,601	0.9897
1OPPREF	22	Opening Unit - Preferred Mail	551,568	535,618	529,941	0.9894
1OPTRAN	23	Opening - Manual transport	98,412	95,517	94,523	0.9896
1PLATFR	24	Platform	1,237,260	1,204,926	1,126,212	0.9347
1POUCHI	25	Pouching Operations	135,719	133,467	132,383	0.9919
1PRESOF	26	Presort	15,725	15,348	14,996	0.9770
1SACKS_	27	Manual Sort - Sack Outside	139,309	136,670	132,941	0.9727
1SCAN	28	Air Contract DCS and Incoming/SWYB	42,431	40,173	39,709	0.9885
1SWYB		Scan Where You Band	57,309	54,330	53,507	0.9849
		Other Operations				
BUSREPL	29	Business Reply / Postage Due	35,168	33,692	32,706	0.9707
EXPRESS	30	Express Mail	91,663	89,139	88,044	0.9877
MAILGRA	31	Mailgram	69	69	56	0.8128
REGISTR	32	Registry	142,815	138,725	60,279	0.4345
REWRAP	33	Damaged Parcel Rewrap	13,983	12,604	11,151	0.8847
1EEQMT	34	Empty Equipment	27,921	22,253	21,422	0.9627
1MISC	35	Miscellaneous Activity	170,165	117,381	103,012	0.8776
1SUPPOF	36	Mail Processing Support	205,157	43,334	38,085	0.8789
LD49	37	LDC 49 - Computerized Forwarding Syst.	278,589	271,904	270,340	0.9942
LD79	38	LDC 79 - Mailing Req' & Bus. Mail Entry	161,407	115,477	59,215	0.5128
INTL ISC	39	**ISCs (International Service Centers)**	156,481	146,783	139,881	0.9530
PMPC	40	**PMPCs (Priority Mail Processing Centers)**	121,537	118,082	116,505	0.9866
		MAIL PROCESSING TOTAL FOR PLANTS	9,733,663	9,253,922	8,957,046	0.9679

B. MAIL PROCESSING - POST-OFFICES, STATIONS & BRANCHES GROUP

SAS name	Cost Pool Title	USPS Pool Total Costs	PRC Mail Proc Pool costs (excl 'migrated')	PRC Mail Proc Pool costs (excl 'clock in/out')	PRC MP Volume-Variable Cost (excl 'clock in/out')	PRC Pool Volume Variable Fraction	PRC Mail Proc Pool costs (incl 'clock in/out')	PRC MP Volume-Variable Cost (incl 'clock in/out')	PRC Pool Volume-Variable Fraction
	B.1 MODS 1&2 Offices LDC41-44,48								
		29,829	28,740				28,740	28,693	0.9978
LD41	LDC 41 - Unit Distribution - Automated	326	307				307	307	0.9998
LD42	LDC 42 - Unit Distribution - Mechanized	645,084	610,793				610,793	595,274	0.9749
LD43	LDC 43 - Unit Distribution - Manual	148,975	131,792				131,792	128,703	0.9827
LD44	LDC 44 - Post-Office Box Distribution	7,506	6,888				6,888	6,804	0.9929
LD48 EXP	LDC 48 - Customer Service / Express	165,188	112,775				112,775	95,615	0.8854
LD48 OTH	LDC 48 - Customer Service / Other	173,767	63,989				63,989	51,069	0.8374
LD48_ADM	LDC 48 - Customer Service / Admin	102,548	86,706				86,706	53,278	0.6295
LD48_SSV	LDC 48 - Customer Service / Spec.Servc.	1,273,223	1,041,991				1,041,991	959,742	0.9296
	Subtotal								
	B.2 Non-MODS Offices					(exclude 'clock in/out')			(include 'clock in/out')
				661,796	616,802	0.9320	671,765	626,093	0.9320
ALLIED	Allied			210,312	209,610	0.9967	213,480	212,767	0.9967
AUTO/MECH	Automated/Mechanized			23,388	23,387	1.0000	23,740	23,740	1.0000
EXPRESS	Express Mail			471,068	470,942	0.9997	478,164	478,036	0.9997
MANF	Manual Flat			695,338	694,284	0.9985	705,812	704,743	0.9985
MANL	Manual Letter			198,712	198,139	0.9971	201,705	201,123	0.9971
MANP	Manual Parcel			330,865	224,072	0.6772	335,849	227,448	0.6772
MISC	Miscellaneous			41,559	13,924	0.3350	42,185	14,133	0.3350
REGISTRY	Registry			2,633,038	2,451,161	0.9309	2,672,701	2,488,085	0.9309
	Subtotal				2,451,161		3,714,692	3,447,826	0.9250
	MAIL PROC TOTAL FOR P.O. STA/BRs								
	C. MAIL PROCESSING - BMCs GROUP								
				39,124	39,123	1.0000	40,334	40,334	1.0000
NMO	Non-Machinable Outside (NMO)			300,240	291,748	0.9717	309,529	300,774	0.9717
OTHR	Allied Labor & all other Mail Processing			203,990	192,381	0.9431	210,301	198,333	0.9431
PLA	Platform			76,305	76,304	1.0000	78,666	78,665	1.0000
PSM	Parcel Sorting Machine			74,255	74,255	1.0000	76,553	76,552	1.0000
SPB	SPBS & Irregular Parcels (IPP & 115)			25,659	25,659	1.0000	26,453	26,453	1.0000
SSM	Sack Sorting Machine								
				719,573	699,471	0.9721	741,835	721,112	0.9721
	MAIL PROCESSING TOTAL FOR BMCs								

Table 5.1 FY 02 Subclass Volume-Variable Costs by Subgroups of Cost Pools, USPS and PRC Versions - Plants

Plants	Distribution Operations (ldc 11-15)		Allied Operations (ldc 17)		function 1 Support (ldc 18,misc&1support)		LDC 18-other (incl Spec Srvcs Ops)		Other (isc pmpc ldc 49 79)		Total for Plants	
	PRC	USPS	PRC	USPS	PRC	USPS	PRC	USPS	PRC	USPS	PRC	USPS
1--Letters - Single Piece 2/	2,233,768	1,921,308	1,256,454	1,020,427	59,827	124,637	30,832	29 924	113 001	105,933	3 693,882	3,202,230
2--Letters - Presort	625,481	548,701	324,967	279,308	15,003	35,941	6,589	6,558	92,509	95,087	1,064 549	965,595
3--Cards - Single Piece	94,014	76,748	41,315	25,571	1,820	4,324	968	928	7,620	6 770	145,738	114,340
4--Cards - Presort	19,658	16,246	9,696	6,707	391	1 014	43	50	4,024	4 363	33 812	28,380
5--Priority Mail 2/	332,373	234,793	197,064	195,339	7,866	22 405	7,644	7,497	115 527	102 748	660 474	562,782
6--Express Mail	5,600	4,032	29,928	23,618	1,823	3 693	67,619	57,588	3,868	3,610	108,838	92,541
8-1 Periodicals-InCounty	3,745	3,123	3,689	3,677	82	309	40	41	948	1,280	8,505	8 430
8-2 Periodicals-OutsideC	247,506	213,497	240,954	214,324	8 653	18 200	2 944	2 867	40 414	37 730	540 470	486 618
10--Standard - ECR	74,483	62,539	73,692	69,614	2 633	5 750	1,903	1 847	4,537	6 221	157,248	145,970
11--Standard - Regular	1,116,097	968,628	723,687	657,453	30,000	70 495	10,593	10,542	48,396	75 630	1,928 773	1,782,748
14--Packg S - Parcels	26,489	21,361	41,901	47,520	1,299	2 971	1,250	1 281	1 246	1,306	72,185	74,438
15--Packg S-Bound Print	25,386	21,294	22,015	21,788	946	1,876	208	205	3 713	4,114	52,267	49,277
16--Packg S-Media Mail	15,241	12,136	14,622	12,893	428	1,094	238	240	920	1,309	31,449	27,672
18--USPS	47,965	40,594	45,599	34,960	2 597	4 658	11 290	17,388	26 748	31 984	134,198	129,584
19--Free Mail	3,484	2,707	2,338	1,874	157	192	32	30	218	185	6 229	4 988
20--International Mail	49,597	41,317	46,495	37,643	3 164	8,139	14 747	14 110	109 413	103 384	223,415	204,593
21--Registered Mail 2/	1,028	463	1,851	559	737	1 243	62 502	28,551	4 354	350	70,472	31,166
22--Certified Mail	18	22	315	35	1,931	4	528	11	164	33	2 956	105
23--Insured Mail	1	1	841	0	227	0	530	1	226	0	1 825	2
24-1MONEY ORDERS		-		-		-				-	-	-
24-2STAMPED ENV		-		-		-		-		-	-	-
24--COD	0	1	60	0	1	0	1	0	0	0	62	1
25-1P.O. BOX		-		-		-		-		-	-	-
25--Special Handling	-	728	670	606	12	57	2	22	136	118	819	1 531
27--Other Spec. Services	9,496	3,617	7,885	1,736	1,787	763	17,395	13 008	9 647	6,618	46 210	25,743
	4,931,428	4,193,857	3,086,037	2,655,652	141,384	307,764	237,897	192 689	587 630	588,772	8 984 375	7,938,734
Subtotal	4,931,428	4,193,857	3,086,037	2,655,652	141 384	307,765	237,897	192 689	587 630	588,772	8 984,375	7,938,735
Registry Fixed 1/	(399)		(718)		(286)		(24,238)		(1 689)		(27,329)	
Volume-Variable Costs	4,931,029	4,193,857	3,085,319	2,655,652	141,098	307,765	213,659	192 689	585,941	588,772	8,957,046	7,938,735
Volume-Variable Fraction	100%	83%	97%	81%	88%	82%	72%	62%	90%	82%	97%	82%
Total Mail Processing Costs	4,954,272	5,049,511	3,190,207	3,279,197	160,714	375,322	296 482	311 619	652 246	718,014	9,253,922	9,733,663

1/ For the PRC version, these costs represent the disaggregated fixed costs for Registry from PRC WS 3 0 2

2/ For the PRC version, these costs represent disaggregated costs for those shown in PRC WS 3 1 1a, however the Registry costs include the fixed costs which will be deducted from the "Registry Fixed" row amount These costs do not show reallocated costs from further adjustment to the Registry Costs in PRC WS 3 1 1

Table 5.2 FY 02 Subclass Volume-Variable Costs by Subgroups of Cost Pools, USPS and PRC Versions - Post-Offices, Stations, and Branches (LDC41-44,48)

Post-Offices, Stations/Branches

	ldc 41-44,48		non-MODs		Total	
	PRC	USPS	PRC 1/	USPS	PRC	USPS
1--Letters - Single Piece 2/	325,192	372,676	950,282	822,319	1,275,474	1,194,995
2--Letters - Presort	114,965	121,318	342,851	292,584	457,816	413,902
3--Cards - Single Piece	10,845	14,458	42,998	34,903	53,843	49,361
4--Cards - Presort	2,843	3,452	9,579	7,945	12,422	11,397
5--Priority Mail 2/	71,440	75,156	125,858	118,724	197,298	193,880
6--Express Mail	16,574	15,594	25,875	21,450	42,449	37,044
8-1 Periodicals-InCounty	1,376	1,645	5,140	5,433	6,516	7,077
8-2 Periodicals-OutsideC	56,850	61,163	149,972	132,003	206,821	193,166
10--Standard - ECR	34,210	33,118	79,185	70,835	113,395	103,953
11--Standard - Regular	198,439	194,418	572,881	508,915	771,320	703,333
14--Packg S - Parcels	23,164	23,672	44,059	43,331	67,223	67,003
15--Packg S-Bound Print	10,921	10,697	20,103	19,150	31,024	29,847
16--Packg S-Media Mail	12,371	12,680	14,498	13,682	26,869	26,362
18--USPS	14,331	19,182	34,575	29,947	48,906	49,129
19--Free Mail	615	651	2,067	1,901	2,682	2,552
20--International Mail	11,374	12,464	18,708	15,651	30,082	28,115
21--Registered Mail 2/	6,770	3,066	3,590	3,267	10,360	6,333
22--Certified Mail	27,457	16,554	22,513	14,833	49,970	31,387
23--Insured Mail	2,389	2,826			2,389	2,826
24-1MONEY ORDERS		6,448			-	6,448
24-2STAMPED ENV		266			-	266
24--COD	902	524	436	289	1,338	813
25-1P.O. BOX		4,385			-	4,385
25--SPECIAL HAND	-	251			-	251
27--Other Spec. Services	19,338	6,614	22,919	11,674	42,256	18,288
	962,367	1,013,278	2,488,087	2,168,836	3,450,454	3,182,114
Subtotal	962,367	1,013,278	2,488,087	2,168,836	3,450,454	3,182,114
Registry fixed	(2,625)					
Volume-Variable Costs	959,742	1,013,278	2,488,087	2,168,836	3,447,829	3,182,114
Volume-Variable Fraction	92%	80%	93%	81%	93%	81%
Total Mail Processing costs	1,041,991	1,273,223	2,672,701	2,672,699	3,714,692	3,945,922

1/ Includes clocking in/out costs, exclude Registry fixed costs (costs from PRC Workpapers WS 3.1.1a)

2/ For the PRC version, the costs for the LDC 41-44 and 48 cost pools represent disaggregated costs that are the outputs from the SAS program. These costs are the LDC41-44, and 48 costs for the MODS 1&2 costs shown PRC WS 3.1.1a but the Registry costs include the fixed costs shown in the "Registry fixed" row. Also these costs do not show reallocated costs from further adjustment to the Registry Costs in PRC WS 3.1.1

Table 5.3 FY 02 Subclass Volume-Variable Costs by Subgroups of Cost Pools, USPS and PRC Versions - BMCs

BMCs	Distribution operations		Allied operations		Total	
	PRC 1/	USPS	PRC 1/	USPS	PRC 1/	USPS
1--Letters - Single Piece 2/	3,922	3,210	11,883	9,320	15,805	12,530
2--Letters - Presort	246	201	1,254	846	1,500	1,047
3--Cards - Single Piece	-	-	175	115	175	115
5--Priority Mail 2/	7,554	6,191	12,576	11,075	20,130	17,267
6--Express Mail	112	91	293	334	405	426
8-1 Periodicals-InCounty	45	37	139	130	184	167
8-2 Periodicals-OutsideC	7,653	6,264	21,233	18,927	28,886	25,191
10--Standard - ECR	4,693	3,836	8,806	7,631	13,500	11,468
11--Standard - Regular	93,020	76,120	203,810	164,984	296,830	241,104
14--Packg S - Parcels	40,930	33,550	92,827	82,183	133,757	115,733
15--Packg S-Bound Print	22,722	18,617	47,576	42,825	70,297	61,442
16--Packg S-Media Mail	19,892	16,303	45,978	37,864	65,870	54,167
18--USPS	8,724	7,140	22,498	21,229	31,222	28,369
19--Free Mail	724	593	687	454	1,411	1,047
20--International Mail	11,512	9,571	29,076	28,052	40,588	37,623
21--Registered Mail 2/	-	-	208	-	208	-
27--Other Spec. Services	257	320	168	293	425	613
	222,004	182,044	499,188	426,262	721,192	608,307
Subtotal	222,004	182,045	499,188	426,262	721,192	608,307
Registry Fixed	-		81		81	
Volume-Variable Costs	222,004	182,045	499,107	426,262	721,111	608,307
Volume-Variable Fraction	100%	82%	96%	82%	97%	82%
Total Mail Processing costs	222,004	222,006	519,831	519,830	741,835	741,836

1/ Include clocking in/out costs

2/ For the PRC version, these costs represent disaggregated costs for those shown in PRC WS 3.1.1a, however, the Registry costs include the fixed costs shown in the "Registry Fixed" row. These costs do not show reallocated costs from further adjustment to the Registry Costs in PRC WS 3.1.1

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-1.

Please refer to your response to POIR No. 3, Question 3(d), to library reference USPSLR- K-101 (as revised in response to Question 1 of POIR No. 2), and to the corresponding library reference in Docket No. R2001-1, PRC-LR-7. Paragraph two of your response states: "The reason the 9.694-cent delivery unit cost for ECR Basic **Letters** is so much higher
[than the corresponding cost of **flats**] is the way that the 'Rural Crosswalk' worksheet in LRK-101 allocates total BY 2004 Rural Carrier Cost System (RCCS) volumes across shapes" (emphasis added).

a. Please confirm that, in Docket No. R2001-1, the delivery unit cost for letters was only 0.086 cents higher than the corresponding cost for flats, and that now it is 3.756 cents higher. If you do not confirm, please provide corrected figures.

b. Please refer to file LR-K-101.xls and confirm that all of the volumes and the volume split factors contained on sheet 'RCCS EVAL' are identical to those on the corresponding file in Docket No. R2001-1, PRC-LR-7. If you do not confirm, please explain.

c. Sentence two of paragraph two of your response states: "Cell C25 in 'Rural Crosswalk' reallocates 1,395,586,000 RCCS ECR flats to ECR letters, based on the 'RCCS EVAL' analysis. Please confirm that the corresponding file in Docket No. R2001-1, PRC-LR-7, reallocates 1,218,016,000 pieces, only 12.7 percent fewer. If you do not confirm, please explain.

d. Sentence three of paragraph two of your response states: "These 1,395,568,000 reallocated flats account for over 29% of the original RCCS ECR total." Please state which "total" volume figure is the "original RCCS ECR total." (Note that candidate volumes would seem to be the flat volume in cell D11, the totalvolume in cell K11, or some volume less boxholder volume, but that none of these are consistent with the "29%" figure.) After specifying which volume reference is intended, please state whether the 29-percent proportion held also in Docket No. R2001-1. If it did not hold, please explain fully.

e. Sentence four of paragraph two of your response states: "Moreover, all 1,395,586,000 flats are reallocated to ECR Basic Auto letters and ECR Basic letters." Please confirm that this was true also in Docket No. R2001-1 and that the proportionate distributions of the 1,395,586,000-figure to each of ECR Basic Auto letters and ECR Basic letters in the instant docket are identical to the corresponding proportionate distributions in Docket No. R2001-1. If you do not confirm, please explain.

f. Sentence five of paragraph two of your response states: "Cell C39 in 'Rural Crosswalk' shows that this reallocation causes a corresponding reallocation of $72,417,000 in rural ECR Basic flats delivery costs to ECR letters." Please confirm that the corresponding reallocation was $70,134,000 in Docket No. R2001-1, only 3.15 percent lower. If you do not confirm, please explain.

g. Sentence six of paragraph two of your response states: "Furthermore, of this $72,417,000, $19,193,000 is allocated to ECR Basic Auto, and $53,224,000 to ECR Basic." Please confirm that, in Docket No. R2001-1, the figure of $70,134,000 was allocated $18,588,000 to ECR Basic Auto and $51,546,000 to ECR Basic, with the proportions of the distribution being exactly the same as in

the current docket. If you do not confirm, please explain.
h. Please confirm that from Docket No. R2001-1 to the instant docket, the delivery cost of ECR Basic **letters increased** 45.69 percent while the corresponding cost of ECR Basic **flats decreased** 3.06 percent. If you not confirm, please explain and state a figure that you believe to be correct.
i. In view of the similarities between the application of the rural crosswalk in the instant docket and in Docket No. R2001-1, many aspects of which are referenced in earlier parts of this question, please state whether you believe that the reason for the 45.69 percent increase in the delivery cost of ECR Basic letters, which is clearly associated with the fact that ECR Basic letters now appear to cost 40.09 percent (3.756 cents) more than corresponding flats, is due to the way that the rural crosswalk allocates base-year rural costs across shapes. If you so believe, please explain how this comes about, pointing out all similarities and differences between the two cases in the way the crosswalk is applied. If you do not so believe, please explain why the cost of letters increased 45.69 percent while the cost of flats decreased 3.06 percent.

Response

a. Not confirmed. In Docket No. R2001-1, PRC-LR-7.xls, the Test Year delivery unit cost for letters was 0.323 cents higher than the corresponding cost for flats. Also, see Witness Kelley's response to R2005-1 MMA/USPS-T16-17c. The table presented in that response shows the revised LR-K-101 TY06 ECR Basic letters and flats unit costs that result from correcting errors in cells M4 – M9 of the 'Delivery Volumes' worksheet. Based on these revised unit costs, the excess of the LR-K-101 TY06 Basic letters unit cost over the corresponding Basic flats unit cost is now 3.619 cents instead of 3.756 cents.

The reason this excess is still so much higher than the corresponding 0.323 cents excess of the R2001-1 Basic letters unit cost over the R2001-1 Basic flats unit cost can be determined through an analysis of the attached table, also attached in Excel. Columns B and C in this table list the BY 2000 PRC-LR-7 rural-carrier unit costs for all ECR letters, and for all ECR flats. The column B unit costs equal total BY 2000 CS10.xls costs per RPW piece, and they are

therefore the pre-crosswalk rural-delivery unit costs. In contrast, the column C unit costs equal the post-crosswalk unit costs. They therefore account for the big increase in the letters total cost, and corresponding big reduction in the flats total cost that are caused by the crosswalk's reallocation of 1,218,016,000 total ECR RCCS flats into ECR letters. Row 4 shows further that the column B "pre-crosswalk" letters unit cost is close to 0.9 cents lower than the pre-crosswalk flats unit cost. This initial large deficiency of the letters unit cost below the flats unit cost ensures that, although the PRC-LR-7 rural crosswalk causes a major (124%) increase in the letters unit cost, and a corresponding big reduction in the flats cost, the post-crosswalk letters unit cost still exceeds the flats cost by only 0.258 cents.

Column F in the attached table lists the pre-crosswalk BY 2004 LR-K-101 rural- ECR unit costs. Unlike the corresponding column B pre-crosswalk unit costs, these column F pre-crosswalk letters and flats unit costs are virtually identical. Moreover, this initial near equality ensures that, although the LR-K-101 rural crosswalk causes a smaller (while still substantial) 49% increase in the letters unit cost, as compared to the 124% increase caused by the PRC-LR-7 rural crosswalk, the LR-K101 crosswalk produces a much bigger excess of the post-crosswalk letters unit cost over the post-crosswalk flats unit cost. Column G shows that the LR-K-101 post-crosswalk letters unit cost is nearly 1 cent higher than the flats cost, as compared with the corresponding PRC-LR-7 excess of only 0.258 cents (column C).

The results just presented apply equally to the comparison of the ECR Basic letters and ECR Basic flats unit costs as they do to the comparison of the total ECR letters and total ECR flats unit costs shown in the table. All of the ECR flats that the PRC-LR-7 and LR-K-101 crosswalks reallocate to letters are reallocated, specifically, from ECR Basic flats into ECR Basic letters, and, to a much lesser extent, into ECR Basic-Auto letters. Therefore, just as the crosswalks cause big increases and reductions in the total letters unit cost and total flats unit costs, respectively, they also cause big increases and reductions in the Basic letters and Basic flats unit costs. Moreover, the PRC-LR-7 crosswalk likewise changes an initial large deficiency in the Basic letters unit cost below the Basic flats unit cost into a small excess of the Basic letters cost above the Basic flats cost; and the LR-K-101 crosswalk changes much closer Basic letters and Basic flats unit cost into a large excess of the Basic letters unit cost over the Basic flats unit cost.

b. Confirmed.

c. Confirmed.

d. First of all, sentence three of paragraph two of that response refers not to "1,395,568,000 reallocated flats," but rather "1,395,586,000 reallocated flats." Secondly, 29% is a typographical error. Also, the total referred to is total ECR flats.

Thus, sentence three of paragraph two should be revised to read: "These 1,395,586,000 reallocated flats account for over 24% of the original total RCCS ECR flats." The corresponding proportion from R2001-1 was 22.6%.

e. Confirmed.

f. Confirmed.

g. Confirmed.

h. Please see Witness Kelley's response to R2005-1 MMA/USPS-T16-17c. The table presented in that response shows the revised LR-K-101 TY06 ECR Basic letters and flats unit costs that result from correcting errors in cells M4 – M9 of the 'Delivery Volumes' worksheet. Based on these revised unit costs, the TY06 Basic letters unit cost equals 9.751 cents. This is 46.54% higher than the corresponding R2001-1 PRC-LR-7 letters unit cost. Also, the TY06 ECR Basic flats unit cost now equals 6.132 cents, which is 3.24% lower than the corresponding PRC-LR-7 flats cost.

i. Clearly, an important reason the ECR Basic letters unit cost increased by 46.54% between R2001-1, PRC-LR-7 and R2005-1, LR-K-101 was the continued application of the rural crosswalk. As the response to POIR No. 3, question 3d shows, had the rural crosswalk not been applied in R2005-1, LR-K-101, the TY06 LR-K-101 ECR Basic Letters unit cost would have equaled only 7.856 cents. Moreover, although the correction referred to in the answer to part b above, increases this "no-rural-crosswalk" cost to 7.889 cents, 7.889 cents is still only 18.07% higher (not 46.54% higher) than the R2001-1 PRC-LR-7 ECR Basic letters unit cost. Furthermore, as the response to VP/USPS-2d below indicates, the justification for doing the rural crosswalk in R2001-1 no longer applied in R2005-1. The R2001-1 rural crosswalk was needed, to a large extent, to reverse the flats adjustment that had been applied in the BY 2000 CS10.xls, in order to

move large portions of RCCS letters into RCCS flats. The BY 2004 CS10.xls used in R2005-1 did not, however, implement any such flats adjustment. Thus, there was no need for LR-K-101 to continue to implement the rural crosswalk in order to reverse the flats adjustment, since there was no longer anything to reverse.

It should also be reemphasized, for purposes of the issues discussed in this interrogatory, that the objective of LR-K-101 was simply to employ the established methodology by applying R2005-1 BY 2004 and TY 2006 cost and volume inputs to the R2001-1 PRC-LR-7 methodology. The dilemma presented under these circumstances of retaining or excluding the rural crosswalk underscores the practical perils of attempting to employ a static established methodology in a dynamic environment.

Mail Subclass - Shape	PRC-LR-7 BY 2000 RURAL COSTS PER RPW PIECE, PRIOR TO CROSSWALK	PRC-LR-7 BY 2000 RURAL COSTS PER RPW PIECE, POST CROSSWALK	POST CROSSWALK UNIT COST MINUS PRE-CROSSWALK UNIT COST	PERCENTAGE CHANGE BETWEEN THE PRE-CROSSWALK AND POST-CROSSWALK UNIT COSTS	LR-K-101 BY 2004 RURAL COSTS PER RPW PIECE, PRIOR TO CROSSWALK	LR-K-101 BY 2004 RURAL COSTS PER RPW PIECE, POST CROSSWALK	POST CROSSWALK UNIT COST MINUS PRE-CROSSWALK UNIT COST	PERCENTAGE CHANGE BETWEEN THE PRE-CROSSWALK AND POST-CROSSWALK UNIT COSTS
ECR Letters	0 448	1.002	0.554	123 8%	1.164	1.728	0.565	48.5%
ECR Flats	1 303	0.744	-0.559	-42.9%	1 223	0.758	-0.465	-38.0%
Excess of ECR Letters over ECR Flats	-0.855	0 258	1.113	N/A	-0.060	0.970	1.030	N/A

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-2.
Please refer to your response to POIR No. 3, Question 3(d), which discusses the role and the effects of the rural crosswalk.
a. In all prior cases in which the Postal Service has presented the rural crosswalk, has the Commission ever rejected or altered any part of it? If yes, please explain.
b. In all prior cases in which the Postal Service has presented the rural crosswalk, has the Commission ever made suggestions for improvement? If yes, please explain.
c. In all prior cases in which the Postal Service has presented the rural crosswalk, has the Commission ever indicated that it was committed to a certain way of handling the crosswalk and/or that it would be resistant, or require a high standard of evidence, to make changes or improvements in it? Please explain any affirmative answer.
d. File LR-K-67.doc of USPS-LR-K-67 states at page 8: "In Docket No. R2001-1, an adjustment was made to the RCS volumes to account for the discrepancy between the shape dimensions for pieces delivered on rural routes and those in the DMM. Since that incongruity has been eliminated, no adjustment is made to the FY04 RCS volumes." Please explain how the "discrepancy" and the "incongruity" were eliminated. Include in your explanation a discussion of whether pieces higher than 5 inches but less than 6 1/8 inches still exist, how rural carriers are paid for them, and how they are treated in the costing process.

Response

a-c. From a review of Commission documents, the Commission has never made any statements that apply specifically to the 'Rural Crosswalk' worksheet in PRC-LR-7.

d. The discrepancy referred to was the gap between the BY 2000 ratio of RCCS letters to the sum of RCCS letters and flats, and the significantly lower Rural-Mail-Counts ratio of letters to letters plus flats. This gap was attributed to the results of an analysis of the BY 2000 RCCS and Rural-Mail-Counts pieces that were higher than 5 inches, but less than 6 1/8 inches, and that should have been recorded as flats. These results indicated that a large portion of the RCCS pieces in this category were erroneously recorded as letters. The BY 2000

CS10.xls therefore applied an adjustment – known as the flats adjustment – that eliminated this discrepancy (or incongruity) by reallocating a large portion of the RCCS letters into RCCS flats.

The rural crosswalk implemented by the R2001-1 PRC-LR-7 and USPS-LR-J-117 analyses was based, to a significant extent, on the view that many, if not all of these BY 2000 RCCS letters that had been reallocated to flats were nevertheless still letters according to DMM definitions. Therefore, the rural crosswalk was designed largely to reverse the BY 2000 CS10.xls flats adjustment.

By FY 2004, however, both the RCCS and Rural Mail Counts were defining pieces higher than 5 inches but less than 6 1/8 inches as letters, not flats. Possibly for this reason, it was also determined that there was no longer any discrepancy between the RCCS and Rural-Mail-Counts measurements of letters and flats, and that, in particular, both systems were correctly counting pieces higher than 5 inches but less than 6 1/8 inches as letters. Therefore, the BY 2004 CS10.xls did not implement any flats adjustment . Moreover, for this reason, there was no longer any need to apply a rural crosswalk in the cost-by-shape analysis to reverse a flats adjustment. The decision to remove the rural crosswalk from the R2005-1 LR-K-67 was the correct decision.

Regarding the payments made for pieces higher than 5 inches but less than 6 1/8 inches, the BY 2000 Rural-Mail Counts defined such pieces as flats, and carriers were paid for delivering the pieces at the minutes per piece rate defined for all delivered flats. The BY 2004 Rural-Mail Counts defined these

pieces as letters, and paid carriers at the non-DPS letters, DPS letters, or sector-segment letters minutes per piece rates, depending on how the letters were distributed across these letter-shape evaluation categories.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-3.
Please refer to your response to POIR No. 3, Question 3(d), to library reference USPSLR- K-101 (as revised in response to Question 1 of POIR No. 2), and to the corresponding library reference in Docket No. R2001-1, PRC-LR-7. Please confirm that (i) the piggyback factor for rural carrier costs in the instant docket is 1.193 and, in Docket No. R2000-1, it was 1.259, and (ii) ceteris paribus, this would tend to lower rural carrier costs in this case and to reduce any effects attributable to the rural crosswalk. If you do not confirm, please explain.

Response

Confirmed.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-4.

Please refer to your response to POIR No. 3, Question 3(d), to library reference USPSLR- K-101 (as revised in response to Question 1 of POIR No. 2), and to the corresponding library reference in Docket No. R2001-1, PRC-LR-7.

a. Please confirm that, according to the sheets referenced, the unit delivery cost of ECR Basic Letters increased 45.68 percent from Docket No. R2001-1 to the instant docket. *See* cell O88 on 'summary TY' in LR-K-101 and cell O86 in PRC-LR-7. If you do not confirm, please explain and present the correct figures.

b. PRC-LR-7 shows a volume of ECR Basic Letters in cell L86 of 'summary TY' of 4,892,022. It also shows a rural volume of ECR Basic Letters of 1,762,679, cell C68 of sheet 'Rural Crosswalk'. Please explain whether this implies a city carrier volume of ECR Basic Letters in Docket No. R2001-1 of 3,129,343 (where all volumes are in thousands). If it does not, please explain the flaws and inaccuracies in the procedure used to arrive at these estimates.

c. USPS-LR-K-101 shows a volume of ECR Basic Letters in cell L88 of 'summary TY' of 2,165,011. It also shows a rural volume of ECR Basic Letters of 2,019,640 in cell B60 of 'Rural Crosswalk.' Please explain whether this implies a city-carrier volume of ECR Basic Letters in the instant docket of 145,371 (where all volumes are in thousands), a 95.4 percent decrease from Docket No. R2001-1. If it does not, please explain the flaws in the procedure used to arrive at these estimates.

d. Cells J87 through J109 of sheet 'summary TY' of file LR-K-101 show that the rural delivery cost is allocated to the letter categories of ECR on the basis of splits obtained, essentially, from the sheet 'RCCS EVAL.'

(i) Is the above statement correct? If not, please provide a correct statement.

(ii) If it is the case that rural costs are allocated on crosswalk split factors, and if these split factors do not accurately reflect current mail volume (possibly because the proportionate number of prebarcoded pieces has increased substantially), please explain whether it follows that the rural costs allocated to the ECR letter categories, which are used to provide discounts to mailers, are in error.

(iii) Please state the observation period to which the volumes and split factors in the sheet 'RCCS EVAL' apply.

e. Cells J87 through J90 of sheet 'summary TY' of file LR-K-101 appear to show that the rural delivery cost for ECR letters is allocated to the letter categories of ECR on the basis of the number of pieces.

(i) Is the above statement correct? If not, please provide a correct statement.

(ii) If the purpose of the analysis is to find the differences in the unit costs of Basic, Basic auto, High Density, and Saturation letters, and the costs are allocated on the basis of the number of pieces, please explain whether this predetermines that, as far as rural carriers are concerned, the costs of all of the categories are the same and no contribution will be made to

any discounts for mailers of the various categories of letters.
f. (i) Is the payment system for rural carriers such that, on rural routes, the Postal Service pays the same for High Density and Saturation mailings as it does for Basic ECR mailings? Please explain.
(ii) If the answer to the preceding part (i) is negative, please explain all differences in the way the Postal Service pays rural carriers for handling each of the above three rate categories.

Response

a. Please refer to the response to VP-USPS-1h.

b. The 4,892,022 in cell L86 of PRC-LR-7 'summary TY' is the TY 2003 ECR Basic Letters volume, whereas the 1,762,679 in cell C68 of PRC-LR-7 'Rural Crosswalk' is the BY 2000 rural (RCCS) volume. The PRC-LR-7 methodology for deriving city-carrier volumes does not lend itself to deriving city-carrier Basic Letters volume from this or any other combination of test year volume and base year RCCS volume.

c. The 2,165,011 in cell L88 of LR-K-101 'summary TY' is the TY 2006 ECR Basic Letters RPW volume, whereas the 2,019,640 in cell B60 of LR-K-101 'Rural Crosswalk' is the BY 2004 rural (RCCS) volume. The LR-K-101 methodology for deriving city-carrier volumes does not lend itself to deriving a city-carrier Basic Letters volume from this or any other combination of a test year volume and base year RCCS volume.

d(i). This statement is not quite correct. The total ECR-letters rural-delivery cost is allocated to Basic-Auto letters, Basic-Non-Auto letters, and the combination of High Density and Saturation letters on the basis of the splits obtained from sheet 'RCCS EVAL.' However, the resulting High-Density plus Saturation letter cost is

disaggregated into a High-Density-only cost and a Saturation-only cost on the basis of RPW volumes.

d(ii) If the 'RCCS EVAL' crosswalk split factors do not accurately reflect current mail volumes, then it follows that the "ECR-letter-category" rural costs derived from these factors will be incorrect.

d(iii) The volumes and split factors in 'RCCS EVAL' were derived from a study conducted between September and November 1998. See R2000-1, USPS-LR-I-173.

e(i) This statement is essentially correct. To be precise, LR-K-101 allocates the rural delivery cost for ECR letters to Basic-Auto letters, Basic-Non-Auto letters, and the combination of High-Density and Saturation letters on the basis of the post-rural-crosswalk measures of RCCS letter pieces. The resulting total High-Density plus Saturation letter-cost is then allocated to High-Density and Saturation based on RPW letters.

e(ii) The LR-K-101 allocation of costs described in the preceding response to e(i) does determine that the rural ECR letter costs per delivered (i.e., RCCS) letter piece will be the same for Basic-Auto letters, Basic-Non-Auto letters, and the combination of High-Density and Saturation letters. However, because the ratios of RCCS letters to RPW letters vary across these three letter categories, the rural ECR letter costs per RPW letter differ substantially across these categories. Furthermore, because RPW letters are also used to split the total rural cost for High Density plus Saturation letters into separate High-Density and Saturation costs, the High-Density and Saturation rural costs per RPW equal one another,

while they also differ substantially from the Basic-Auto and Basic-Non-Auto unit costs per RPW.

f(i and ii) The payment system for rural carriers does not determine payments based on differences across mail subclass, or across rate categories within subclass. Therefore, it does not distinguish between High Density and Saturation mailings and Basic mailings within the ECR subclass. Payments per piece vary only according to mail shape, and according to whether the mail piece is delivered or collected, whether the delivered piece is a boxholder or a non-boxholder piece, and whether the delivered piece has postage due.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-5.

Please refer to your response to POIR No. 3, Question 3(d), to library reference USPSLR-K-101 (as revised in response to Question 1 of POIR No. 2), and to the corresponding library reference in Docket No. R2001-1, PRC-LR-7. Line 12 of the third paragraph of your response refers to "[t]he piggyback-inflated rural ECR Basic letters unit cost," as shown on sheet 'summary BY' of file LR-K-101 and, in rolled-forward form on sheet 'summary TY' of the same file, cells N87-N90. Corresponding costs for Docket No. R2001-1 may be found in cells N85-N88 of sheet 'summary TY' in PRC-LR-7. Drawing on the cells referenced, note that the "piggyback-inflated ECR Basic letters unit cost," to which you refer in your response, increases from 2.31 cents in Docket No. R2001-1 to 5.81 cents in the instant docket, an increase of 151.5 percent.

a. Given that the costs of 2.31 cents and 5.81 cents are derived by dividing an estimate of rural cost by a volume figure that includes both city volume and rural volume, please confirm that these cost figures really have little or nothing to do with the cost of rural delivery in question. Please explain any disagreement, describing what those cost figures actually represent.

b. Suppose the piggyback-inflated estimates of rural costs (such as those that would be obtained by multiplying cell K88 times cell J120 on sheet 'summary TY' of file LR-K-101) were divided by the volumes shown in cells B59 through B61 of sheet 'Rural Crosswalk' of the same file, with appropriate adjustment for the fact that separate volumes are not shown for High Density and Saturation.

(i) Please explain whether the result of this division would provide a meaningful estimate of unit rural delivery costs. If you explain that this procedure has limitations, please provide an improved estimate.

(ii) Please confirm that use of this procedure generates a unit rural cost in Docket No. R2001-1 of 6.40 cents, and, in the instant docket, of 6.22 cents, a decrease of 2.81 percent.

(iii) To the extent to which there are strong similarities with respect to the application of the rural crosswalk in Docket No. R2000-1 and the instant docket, as suggested in VP/USPS-1, please explain whether this implies that, with respect to an increase in the cost of Basic ECR letters in the instant docket (which might contribute to a higher cost for Basic ECR letters than for Basic ECR flats, which was the subject POIR question), the problem is in the costing on city routes and not in either the costing of rural routes or in any procedure associated with the rural crosswalk.

Response

a. The costs referred to are estimates of rural-carrier Basic letter costs per RPW

letter piece - defined as the piggyback-inflated ECR Basic letter rural cost per

delivered (RCCS) letter, times the ratio of rural-delivered Basic letters to RPW Basic letters. Since the RPW Basic letters are the totals delivered everywhere, not just to rural routes, the ECR Basic letter cost per RPW is the rural-delivery Basic-letter unit cost times the percentage of RPW Basic letters delivered on rural routes. Thus, the rural ECR Basic letter cost per RPW does equal the true expected rural-carrier delivery cost per piece, in the sense that it equals the cost of delivering the piece on a rural route, times the likelihood that this piece will be delivered to a rural route, instead of to a city route, post office box, or some other non-rural location.

b(i) First, it is assumed that, in the first sentence of your question, you meant to multiply cells K87 through K88 by cell J120 on LR-K-101, 'Summary TY', and divide by the letter volumes in cells B59 through B60 of LR-K-101, 'Rural Crosswalk'. You also meant to multiply the sum of cells K89 and K90 by cell J120 in 'Summary TY', and divide by cell B61 in 'Rural Crosswalk'. Given this clarification of the question, the results of these divisions would provide meaningful estimates of unit rural-delivery costs in the sense that, if the numerators and denominators referred to are accurate measures of the true rural-delivery costs, and true letter pieces delivered, then those divisions do produce the correct unit rural-delivery costs per delivered piece.

Note, however, that the numerators referred to in the part b question are estimates of TY 2006 total costs, whereas the denominators are estimates of BY 2004 rural volumes. If LR-K-101 is to be used to compute TY 2006 unit rural-delivery costs per delivered piece for the ECR letter categories, then the TY 2006

total costs in these categories should be divided by estimates of corresponding TY 2006 rural letter volumes, not BY 2004 volumes. One way to derive such test year letter volumes is to multiply the BY 2004 rural letter volumes in cells B59 through B61 of 'Rural Crosswalk' by the ratio of the TY 2006 RPW volumes in cells K87 through K90 of 'Summary TY' over the BY 2004 RPW volumes in cells K86 through K89 of 'Summary BY'. Note that this method derives the TY 2006 rural letter volumes based on the view that they increased between BY 2004 and TY 2006 at the same rate as the RPW letter volumes increased. The TY 2006 total costs divided by the TY 2006 rural letter volumes derived in this manner equal 5.63 cents.

It should also be emphasized that, although the unit rural-delivery costs per delivered piece calculated in the manner just described are conceptually valid LR-K-101 measures of how much rural-delivery cost is generated by the delivery of one ECR letter to one rural route, computing such measures is not the objective of the LR-K-101 or LR-K-67 analyses. The objective is instead to measure rural delivery costs per RPW piece, and to combine these measures with estimates of city-carrier costs per RPW piece to produce the total TY 2006 delivery costs per test year volume reported in the 'Table 1' worksheets of both library references.

b(ii) Partially confirmed. The R2005-1 Basic letters unit rural-delivery cost is 6.23 cents, not 6.22 cents, and the decrease between the R2001-1 unit cost and this 6.23 cents is 2.74 percent, not 2.81 percent.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

b(iii) Please see the responses to VP/USPS-1(i), 4(b), and 4(c) above.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-6

Please refer to your response to Question 3(c) of POIR No. 3. In the first paragraph you state: "There are several reasons why the mail processing unit cost of Basic ECR letters (non-automation rate) is greater than that of Basic ECR nonletters." You go on to state that many of these letters are now delivery point sequenced on automated equipment and that "[t]his additional distribution step at the plant, along with accompanying allied labor activities, increases mail processing costs of ECR letters relative to nonletters, all other things being equal." The costs at issue are PRC-version costs and are developed in library reference USPSLR-K-107.

a. When letters are shifted from manual carrier operations to automated delivery point sequence ("DPS") operations in plants, should not the decrease in the cost of carrier operations be larger than the increase in cost of the automated plant operations, including the effect of the piggyback factors you discuss in the second paragraph of your answer? Please explain in detail any negative answer.

b. Would you agree that, if the result outlined in part a does not occur, the DPS equipment and associated program could not show a positive return on investment? Please explain any disagreement.

c. Please quantify the decrease in carrier cost associated with the increase in plant operations costs attendant to a shift to delivery point sequencing the letters in question, including the effects of the piggyback factors.

d. Please discuss the relative sensitivities of the analytical methods and procedures in library references USPS-LR-K-107 and USPS-LR-K-84 to any reduction in carrier costs associated with recent shifts toward DPS operations in plants for ECR letters.

RESPONSE:

(a) Yes, for automation compatible pieces the practice of capturing and/or backhauling letters to the plant for DPS processing should, in theory, produce carrier cost savings that are greater than the costs associated with DPS processing itself.

(b) Yes, though the economic return of DPS processing depends on the net cost savings for all DPS letters, and not the cost savings for basic ECR letters alone.

(c) We do not have any estimates of the decrease in carrier costs associated with the DPS of ECR Basic letters.

(d) Since both library references describe mail processing cost analyses, neither would directly be sensitive to carrier cost changes.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-7

Please refer to the response to VP/USPS-1a, which shows in an attached table that prior to the rural crosswalk, and thus, based on cost segment 10 costs, the unit rural cost of letters **increased** from Docket No. R2001-1 to the instant docket from 0.448 cents to 1.164 cents, an increase of 159.8 percent, while the unit rural cost of flats **decreased** from one docket to the next from 1.303 cents to 1.223 cents, a decrease of 6.1 percent.

a. Please explain why the cost of letters increased 159.8 percent and the cost of flats decreased 6.1 percent.

b. If there were changes in the methods by which rural costs were developed in the cost segment 10 analysis that contributed to the growth pattern outlined in this question, please explain separately each change, the reason for the change, and the effect of the change.

c. The disparity/anomaly in the costs of letters and flats is said to be due in substantial degree to the effects of the rural crosswalk. Please explain why it is not even more reasonable to conclude that the disparity is caused by the massive increase in the segment 10 cost of letters, on top of which the crosswalk is applied.

Response

a. and b. The reason for these changes is that the rural-flats adjustment that the CRA applied to the BY 2000 CS10.xls rural letters and flats costs that were then input into the R2000-1 PRC-LR-7 analysis was discontinued prior to BY 2004. Therefore, this adjustment was not applied to the CRA's BY 2004 CS10 letters and flats costs that were input into the R2005-1 LR-K-101 update to PRC-LR-7.

c. It is not more reasonable due to the fact that the rural unit delivery costs in LR-K-101 before the rural crosswalk are 1.164 and 1.223 cents (column F on the attached spreadsheet in response to VP/USPS-1a) for letters and flats respectively. This is an operationally reasonable result. The application of the crosswalk causes the unit delivery costs to become counter-intuitive with the delivery unit costs for letters being more than flats.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

The disparity that the VP/USPS-1a question and response refer to, and that justifies my rejection of the PRC-LR-7/LR-K-101 rural crosswalk methodology is not a disparity between R2001-1 and R2005-1 unit costs. It is instead a disparity between the unit costs derived for any given fiscal year with and without the rural crosswalk. For BY 2004, column F of the table attached to the VP/USPS-1a response shows that the CRA ECR unit costs, equal to the CS10 total costs divided by RPW letters and flats, are quite reasonable. They are slightly lower for letters than for flats. The rural crosswalk, however, causes an operationally implausible, massive increase in the ECR letters unit cost, and similarly massive decrease in the ECR flats unit cost such that the post-rural-crosswalk letters unit cost exceeds the post-crosswalk flats unit cost by an absurd 128%. It is even more reasonable to conclude that the rural crosswalk should be discontinued.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-8.
Please refer to the response to VP/USPS-4d(ii), which includes the following statement: If the 'RCCS EVAL' crosswalk split factors do not accurately reflect current mail volumes, then it follows that the "ECR-letter category" rural costs derived from these factors will be incorrect. Do you believe that the split factors used in USPS-LR-K-101 are inaccurate in their representation of current mail volumes? If so, please present any evidence available showing how far from accurate the split factors are.

Response

The 'RCCS EVAL' split factors are no longer applicable to the distribution of mail delivered on rural routes. The primary rationale for implementation of the rural crosswalk was the discrepancy in shape definitions between the DMM and the National Mail Count which is used to evaluate rural routes. This discrepancy no longer exists. Please refer to the response of ADVO/USPS-T18-1c for the timing of the reconciliation between the shape definitions used for the DMM and the National Mail Count.

A specific example should illustrate this point more clearly. The post-crosswalked volumes are 5.7 billion and 14.8 billion for ECR and Standard Regular letters respectively (source LR-K-101 worksheet 'Rural Crosswalk'). The volumes derived from the RCCS system are 3.3 billion and 12.6 billion pieces (source LR-K-67 worksheet '9Delivery Volumes') for ECR and Standard Regular letters respectively. A comparison of these distributions indicates that ECR is 21 percent of the combined total of ECR and Standard Regular letters without the crosswalk and 28 percent of the total after the implementation of the crosswalk. As a result of the implementation of the crosswalk, ECR letters incur a significantly larger portion of the volume variable cost.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-9.
Please refer to the response to VP/USPS-4e(ii), which explains that "because the ratios of RCCS letters to RPW letters vary across" the categories of "Basic-Auto letters, Basic-Non-Auto letters, and the combination of High-Density and Saturation letters," the "rural ECR letter costs per RPW letter differ substantially across these categories." Please explain how any differences in these "costs per RPW letter" for the categories in question translate into any differences in rates or discounts for the categories.

Response

The unit delivery costs derived in USPS-LR-K-101 were not used to develop

rates in Docket No. R2005-1.

Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-10.
Please refer to the responses to VP/USPS-5b(ii) and (iii), which agree that very rough estimates can be prepared which suggest that the fully-piggybacked, post-rural-crosswalked cost of delivering a letter on a rural route has **decreased** between Docket No. R2001-1 and the instant docket by something in the neighborhood of 2.74 percent.
a. Please reconcile this estimate of a 2.74-percent **reduction** with the indication in the table attached to the response to VP/USPS-1 that the post-rural-crosswalked cost of a letter **increased** over the same period from 1.002 cents to 1.728 cents, an increase of 72.4 percent.
b. Please confirm that instead of adding rural and city costs per RPW piece to get a total delivery cost, one could just as easily and with the same result calculate a specific cost for rural delivery (such as the estimate of 5.63 cents developed in the response to VP/USPS-5b(i)) and a specific cost for city delivery, and take an appropriate weighted average of the two. If you do not confirm, please explain in detail why this could not be done.
c. Please consider the approach of taking a weighted average of a 5.63-cent figure and a corresponding figure for city routes. If the increase in the 5.63-cent figure has been somewhere in the neighborhood of 2.74 percent and the increase in weighted average has been somewhere in the neighborhood of 46.54 percent, as suggested in the response to VP/USPS-1h, please explain the implications for the increase in the specific cost of city delivery.

Response

Response

a. The 2.74 percent cited in the question refers to a unit delivery cost per rural delivered piece. The 72.4 percent increase cited in the question is calculated by taking rural costs divided by originating volume. Incidentally, if the numerators of these 1.002 cent and 1.728 cent costs are divided by RCCS volumes instead of RPW volumes, they equal 4.243 cents and 4.567 cents, respectively, implying a 7.63 percent increase, instead of a 2.74 percent reduction.

b. Confirmed as long as the proper weights are applied to the unit costs. A weighted average with the formula below will equal the unit delivery costs as calculated in LR-K-101 as well as LR-K-67.

Notation:

C test year cost

V test year volume

c city

j rate category

o originating

r rural

w weight

U unit cost

$$U_{rj} = \frac{C_{rj}}{V_{rj}}, U_{cj} = \frac{C_{cj}}{V_{cj}}$$

$$w_{rj} = \frac{V_{rj}}{V_{oj}}, w_{cj} = \frac{V_{cj}}{V_{oj}}$$

Unit Delivery Cost (UDC), for rate category I, as calculated in LR-K-101 and LR-K-67 is $UDC_j = w_{rj}U_{rj} + w_{cj}U_{cj} = \frac{C_{rj} + C_{cj}}{V_{oj}}$

c. In order to explain the unit cost implications for city delivery, as you define it, the previous and current weights as defined in part b. need to be known. The relative proportion of volume delivered on city and rural routes has a significant impact on the unit delivery cost per originating piece.

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Response of the United States Postal Service to Interrogatories Posed by Valpak Dealer's Association, Inc.

VP/USPS-11.
Please refer to the response to VP/USPS-4f(i and ii), which states that payments to rural carriers "vary only according to mail shape, and according to whether the mail piece is delivered or collected, whether the delivered piece is a boxholder or a non-boxholder piece, and whether the delivered piece has postage due." Please explain whether the payment to rural carriers varies for letters according to whether they are delivery point sequenced, which, as explained in the response to VP/USPS-6(a), would be expected to cause increased mail processing costs. If it does not, please explain whether it follows that neither the mailers nor the Postal Service generally are receiving any benefit from delivery point sequencing letters on rural routes and that, indeed, they may be paying a penalty.

Response

Payments made to rural carriers for letters do vary for according to whether the letters are delivery point sequenced. In BY 2004, rural carriers received an allowance of 0.0333 minutes per DPS letter, 0.0587 minutes per sector segment letter, and 0.0699 minutes non-DPS/non-sector-segment letter. The term "costs-by-shape" is often used to refer to variations in rural costs per delivered piece across all rural-evaluation categories, including categories such as DPS, sector-segment, and regular letters that really have the same shape.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.
AND VALPAK DEALERS' ASSOCIATION, INC.

VP/USPS-12.
Please refer to the institutional response to IRET/USPS-3b, which states:
It is not clear if voluntarily pre-funded amounts would be considered expenses of the Postal Service under the Act.

a. Please identify and discuss all reasons why voluntarily pre-funded amounts (for post-retirement health benefit obligations) might not be considered expenses of the Postal Service under the Act.

b. Please identify and describe all other types of amounts that might not be considered expenses of the Postal Service under the Act.

Response:

a. As referenced in response to IRET/USPS-3a, Postal Service funding of post-retirement health benefit obligations is in accordance with current law. If the Postal Service were to voluntarily pre-fund amounts for post-retirement health benefit obligations, any such amounts could be construed as arbitrary and not in accordance with current law.

b. Other expenses that might not be considered expenses of the Postal Service under the Act would be any such expenses that are contrary to current law.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF VALPAK

VP/USPS-13. For Base Year 2004, please provide information similar to that shown in the response to ADVO/USPS-T43-1 in Docket No. R2001-1; *i.e.*, mail processing (Cost Segment 3.1), window service (Cost Segment 3.2) and in-office (Cost Segment 6.1) cost data, disaggregated by weight increment, shape, and density level.

RESPONSE:

The disaggregated costs for mail processing are presented in Attachment A,

window service in Attachment B, and city carrier in-office in Attachment C.

Supporting documentation is provided in USPS-LR-K-146.

Attachment A – Provided in Response to VP/USPS-13

BY04 Mail Processing (Cost Segment 3.1) Costs ($000) - No Piggyback or Premium Pay Factors Applied
Standard ECR Mail (Regular and Nonprofit)

	< 1/2 oz	1/2 - 1 oz	1 - 1 1/2 oz	1 1/2 - 2 oz	2 - 2 1/2 oz	2 1/2 - 3 oz	3 - 3 1/2 oz	3 1/2 - 4 oz	4 oz - 5 oz	5 oz - 6 oz	6 oz - 7 oz	7 oz - 8 oz
Standard ECR Mail - Basic												
-Letters	15,975	20,970	2,917	1,825	440	805	2,002	116	301	13	1	593
-Flats	10,006	20,322	17,607	20,487	16,182	14,707	17,877	29,021	14,820	8,322	4,233	3,683
-Parcels	950	5	122	298	107	5	10	934	1,048	17	0	1,761
Total	26,932	41,297	20,646	22,610	16,729	15,516	19,889	30,070	16,169	8,352	4,235	6,038
Standard ECR Mail - Saturation												
-Letters	7,576	3,626	1,177	853	1,067	938	125	411	10	5	2	10
-Flats	4,532	1,465	3,440	1,675	3,298	942	2,324	4,152	498	130	378	259
-Parcels	0	0	154	35	0	0	0	36	0	35	0	0
Total	12,109	5,092	4,771	2,563	4,365	1,881	2,449	4,600	508	170	381	269
Standard ECR Mail - High Density												
-Letters	1,552	1,423	207	642	1	1	1	240	2	1	0	1
-Flats	394	706	619	104	304	356	3	678	2	4	155	1
-Parcels	0	0	0	302	0	0	0	0	1	0	0	0
Total	1,946	2,129	826	1,047	305	357	4	918	5	5	155	2
Standard ECR Mail - Automatation												
-Letters	9,152	4,948	1,569	921	3	639	27	151	2	5	0	4
-Flats	0	0	0	0	0	0	0	0	0	0	0	0
-Parcels	0	0	0	0	0	0	0	0	0	0	0	0
Total	9,152	4,948	1,569	921	3	639	27	151	2	5	0	4
Total Standard ECR Mail												
-Letters	34,256	30,967	5,869	4,242	1,511	2,383	2,155	918	314	24	4	609
-Flats	14,933	22,493	21,666	22,266	19,784	16,005	20,203	33,851	15,320	8,456	4,766	3,943
-Parcels	950	6	276	635	107	5	10	970	1,049	53	0	1,761
Total	50,139	53,466	27,811	27,142	21,402	18,394	22,369	35,739	16,683	8,533	4,770	6,313

Attachment A – Provided in Response to VP/USPS-13 (Continued)

BY04 Mail Processing (Cost Segment 3.1) Costs ($000) - No Piggyback or Premium Pay Factors Applied
Standard ECR Mail (Regular and Nonprofit)

	8 oz - 9 oz	9 oz - 10 oz	10 oz - 11 oz	11 oz - 12 oz	12 oz - 13 oz	13 oz - 14 oz	14 oz - 15 oz	15 oz - 16 oz	> 16 oz	Total
Standard ECR Mail - Basic										
-Letters	13	9	13	5	0	0	2	15	0	46,017
-Flats	945	1,617	1,642	684	302	262	534	2,454	0	185,706
-Parcels	7	1	381	3	1,813	2,473	0	11	0	9,948
Total	966	1,627	2,036	692	2,115	2,735	536	2,480	0	241,670
Standard ECR Mail - Saturation										
-Letters	134	3	2	1,282	0	0	0	11	0	17,233
-Flats	359	634	1	1	0	0	0	11	0	24,100
-Parcels	0	0	0	0	0	0	0	0	0	261
Total	493	637	3	1,283	0	0	0	21	0	41,594
Standard ECR Mail - High Density										
-Letters	2	1	0	1	0	0	0	2	0	4,077
-Flats	1	0	0	0	0	0	0	2	0	3,328
-Parcels	48	0	0	0	45	32	0	0	0	430
Total	51	1	1	1	45	32	1	4	0	7,835
Standard ECR Mail - Automatation										
-Letters	6	2	7	4	0	0	0	7	0	17,449
-Flats	0	0	0	0	0	0	0	0	0	0
-Parcels	0	0	0	0	0	0	0	0	0	0
Total	6	2	7	4	0	0	0	7	0	17,449
Total Standard ECR Mail										
-Letters	156	15	22	1,292	0	0	3	34	0	84,775
-Flats	1,305	2,251	1,643	685	302	262	535	2,467	0	213,134
-Parcels	55	1	381	3	1,859	2,505	0	11	0	10,639
Total	1,516	2,268	2,047	1,980	2,160	2,767	537	2,512	0	308,548

Attachment B – Provided in Response to VP/USPS-13

BY04 Window Service (Cost Segment 3.2) Costs ($000) - No Piggyback Factors Applied
Standard ECR Mail (Regular and Nonprofit)

	< 1/2 oz	1/2 - 1 oz	1 - 1 1/2 oz	1 1/2 - 2 oz	2 - 2 1/2 oz	2 1/2 - 3 oz	3 - 3 1/2 oz	3 1/2 - 4 oz	4 oz - 5 oz	5 oz - 6 oz	6 oz - 7 oz	7 oz - 8 oz
Standard ECR Mail - Basic												
-Letters	312	165	143	6	3	2	1	0	0	0	0	0
-Flats	49	321	228	77	290	248	316	137	155	87	41	24
-Parcels	0	0	0	0	0	0	0	0	0	0	0	0
Total	361	487	371	84	293	251	317	137	155	87	41	24
Standard ECR Mail - Saturation												
-Letters	197	63	13	16	25	17	5	4	2	1	0	0
-Flats	228	72	83	104	151	97	28	198	121	69	33	17
-Parcels	0	0	0	0	0	0	0	0	0	0	0	0
Total	425	134	96	121	176	114	32	202	12	70	33	17
Standard ECR Mail - High Density												
-Letters	30	17	2	1	2	1	0	0	0	0	0	0
-Flats	4	7	8	10	14	24	11	7	17	18	13	8
-Parcels	0	0	0	0	0	0	0	0	0	0	0	0
Total	34	24	10	11	16	26	11	7	17	18	14	8
Standard ECR Mail - Automatation												
-Letters	93	78	12	3	2	2	0	0	0	0	0	0
-Flats	0	0	0	0	0	0	0	0	0	0	0	0
-Parcels	0	0	0	0	0	0	0	0	0	0	0	0
Total	93	78	12	3	2	2	0	0	0	0	0	0
Total Standard ECR Mail												
-Letters	632	322	170	27	32	22	7	5	3	1	0	0
-Flats	281	400	319	191	456	370	355	342	294	174	88	49
-Parcels	0	0	0	0	0	0	0	0	0	0	0	0
Total	913	723	489	218	488	393	361	346	296	175	88	49

Attachment B – Provided in Response to VP/USPS-13 (Continued)

BY04 Window Service (Cost Segment 3.2) Costs ($000) - No Piggyback Factors Applied
Standard ECR Mail (Regular and Nonprofit)

	8 oz - 9 oz	9 oz - 10 oz	10 oz - 11 oz	11 oz - 12 oz	12 oz - 13 oz	13 oz - 14 oz	14 oz - 15 oz	15 oz - 16 oz	> 16 oz	Total
Standard ECR Mail - Basic										
-Letters	0	0	0	0	0	0	0	0	0	632
-Flats	14	9	8	5	3	1	1	2	0	2,019
-Parcels	0	0	0	0	0	0	0	0	0	0
Total	14	9	8	5	3	1	1	2	0	2,651
Standard ECR Mail - Saturation										
-Letters	0	0	0	0	0	0	0	0	0	344
-Flats	9	3	1	1	0	0	0	0	0	1,215
-Parcels	0	0	0	0	0	0	0	0	0	0
Total	9	3	1	1	0	0	0	0	0	1,559
Standard ECR Mail - High Density										
-Letters	0	0	0	0	0	0	0	0	0	54
-Flats	5	3	3	1	0	0	0	0	0	155
-Parcels	0	0	0	0	0	0	0	0	0	0
Total	5	3	3	1	0	0	0	0	0	209
Standard ECR Mail - Automatation										
-Letters	0	0	0	0	0	0	0	0	0	190
-Flats	0	0	0	0	0	0	0	0	0	0
-Parcels	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	190
Total Standard ECR Mail										
-Letters	0	0	0	0	0	0	0	0	0	1,221
-Flats	27	15	12	6	4	2	1	2	0	3,389
-Parcels	0	0	0	0	0	0	0	0	0	0
Total	28	15	12	6	4	2	1	2	0	4,610

Attachment C – Provided in Response to VP/USPS-13

BY04 City Carriers (Cost Segment 6.1) Costs ($000) - No Piggyback Factors Applied
Standard ECR Mail (Regular and Nonprofit)

	< 1/2 oz	1/2 - 1 oz	1 - 1 1/2 oz	1 1/2 - 2 oz	2 - 2 1/2 oz	2 1/2 - 3 oz	3 - 3 1/2 oz	3 1/2 - 4 oz	4 oz - 5 oz	5 oz - 6 oz	6 oz - 7 oz	7 oz - 8 oz
Standard ECR Mail - Basic												
-Letters	13,155	6,626	1,450	713	430	95	683	682	345	76	182	97
-Flats	10,061	22,081	14,410	15,598	14,524	11,380	17,382	19,133	10,446	6,736	3,498	3,528
-Parcels	0	0	2	3	7	0	0	11	0	2	0	0
Total	23,217	28,706	15,861	16,314	14,962	11,475	18,066	19,826	10,791	6,815	3,680	3,625
Standard ECR Mail - Saturation												
-Letters	20,449	3,249	348	734	666	337	704	230	214	266	127	74
-Flats	6,582	3,359	2,675	3,444	3,195	2,252	2,346	3,082	2,345	770	548	368
-Parcels	0	0	0	0	0	0	0	0	0	0	0	0
Total	27,032	6,608	3,023	4,178	3,862	2,589	3,049	3,312	2,559	1,036	676	441
Standard ECR Mail - High Density												
-Letters	3,073	946	207	160	0	89	0	0	0	90	0	0
-Flats	1,070	1,099	1,592	1,328	487	1,026	1,145	1,437	482	0	165	178
-Parcels	0	0	2	0	0	0	0	0	0	0	0	0
Total	4,144	2,045	1,801	1,488	487	1,116	1,145	1,437	482	90	165	178
Standard ECR Mail - Automatation												
-Letters	981	1,017	630	0	0	0	129	0	0	0	0	0
-Flats	0	0	0	0	0	0	0	0	0	0	0	0
-Parcels	0	0	0	0	0	0	0	0	0	0	0	0
Total	981	1,017	630	0	0	0	129	0	0	0	0	0
Total Standard ECR Mail												
-Letters	37,659	11,838	2,634	1,607	1,097	521	1,516	912	559	432	309	171
-Flats	17,714	26,539	18,677	20,370	18,207	14,658	20,873	23,651	13,273	7,506	4,212	4,073
-Parcels	0	0	4	3	7	0	0	11	0	2	0	0
Total	55,373	38,377	21,316	21,980	19,310	15,179	22,389	24,574	13,832	7,940	4,521	4,244

Attachment C – Provided in Response to VP/USPS-13 (Continued)

BY04 City Carriers (Cost Segment 6.1) Costs ($000) - No Piggyback Factors Applied
Standard ECR Mail (Regular and Nonprofit)

	8 oz - 9 oz	9 oz - 10 oz	10 oz - 11 oz	11 oz - 12 oz	12 oz - 13 oz	13 oz - 14 oz	14 oz - 15 oz	15 oz - 16 oz	> 16 oz	Total
Standard ECR Mail - Basic										
-Letters	0	0	0	0	0	0	0	0	0	24,536
-Flats	1,425	467	331	383	233	320	270	167	0	152,373
-Parcels	0	0	0	0	0	0	0	0	0	25
Total	1,425	467	331	383	233	320	270	167	0	176,934
Standard ECR Mail - Saturation										
-Letters	0	0	0	128	0	0	0	0	0	27,525
-Flats	324	222	0	95	0	0	95	90	0	31,792
-Parcels	0	0	0	0	0	0	0	0	0	0
Total	324	222	0	222	0	0	95	90	0	59,317
Standard ECR Mail - High Density										
-Letters	0	0	0	0	0	0	0	0	0	4,565
-Flats	91	388	0	0	0	169	0	0	0	10,658
-Parcels	0	0	0	0	0	0	0	0	0	2
Total	91	388	0	0	0	169	0	0	0	15,225
Standard ECR Mail - Automatation										
-Letters	0	0	0	0	0	0	0	0	0	2,757
-Flats	0	0	0	0	0	0	0	0	0	0
-Parcels	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	2,757
Total Standard ECR Mail										
-Letters	0	0	0	128	0	0	0	0	0	59,383
-Flats	1,839	1,076	331	478	233	489	365	257	0	194,823
-Parcels	0	0	0	0	0	0	0	0	0	27
Total	1,839	1,076	331	606	233	489	365	257	0	254,233

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-2.
Your testimony, at Section V, pages 4-5, discusses how IOCS sample data are used to produce estimates of costs by function for each craft group, with the cost-weighted IOCS data file then used to produce the mail processing cost estimates for the classes and subclasses of mail shown in your Table 1 and estimates of in-office city carrier costs in your Table 2 (along with coefficients of variation ("CVs") for each estimate).

a. Are the cost estimates in Tables 1 and 2 based solely on tallies taken when employees were handling mail? Alternatively, do those cost estimates somehow reflect and include other tallies where no mail was being handled, such as moving empty equipment? If the latter is the case, please explain how all tallies, where no single class or subclass of mail is identified, are incorporated into the final cost estimates for Segments 3.1 and 6.1, mail processing and inoffice carrier costs, respectively.
b. Please explain how all tallies that indicate "handling mixed mail" are incorporated into the cost estimates shown in your Tables 1 and 2.
c. Are each of the cost estimates shown in Tables 1 and 2 unbiased estimates?
d. If your answer to preceding part c is affirmative, please explain all assumptions or conditions that must be satisfied in order to conclude that these cost estimates are unbiased. In your response, please address specifically what assumptions about the distribution of costs from tallies, where no specific class or subclass of mail was being handled, are necessary in order for the resulting cost estimates to be unbiased.
e. Unless your answer to preceding part c is an unqualified affirmative, please explain the nature and source of any biases, either known or suspected, to exist in the cost estimates shown in Tables 1 and 2.

Response:

c.-e. The Postal Service's BY 2004 costing methods, including those used in the generation of the cost estimates in witness Shaw's Tables 1 and 2, are intended to produce base year volume-variable costs that accurately reflect actual operating conditions in the base year. For a review of assumptions underlying the Postal Service and Commission mail processing cost methodologies, how those assumptions mitigate costing biases, and some discussion of biases in the pre-Docket No. R97-1 LIOCATT mail processing

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

method, see PRC Op., Docket No. R97-1, at 130-140. For cost segment 6.1, please see LR-K-1 at 6-2 to 6-3.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-3.

Please refer to the Segment 3.1 mail processing costs and Segment 6.1 city carrier costs shown, respectively, in Tables 1 and 2 that accompany your testimony.

a. Would dividing the estimated costs shown for each class of mail in the first column of each table by the respective volumes for each class result in the estimated unit cost for Cost Segments 3.1 and 6.1? If any adjustment would be necessary in order to develop the correct unit cost for these two segments, please indicate what those adjustments would be.

b. If estimated unit costs were developed for each class and subclass of mail, as described in preceding part a (including any necessary adjustments which you may indicate in your response), would you consider those unit costs for each subclass to be the marginal cost of mail processing (Segment 3.1) and city carrier in-office work (Segment 6.1)? Please explain your answer.

c. For unit cost estimates generated by the IOCS, what assumptions and conditions are necessary and sufficient in order for those estimates to be used as a proxy for marginal cost?

Response.

a. Yes, in part. The costs reported in witness Shaw's Tables 1 and 2 represent the outputs of, respectively, witness Van-Ty-Smith's mail processing cost distribution programs (see USPS-LR-K-55, part II) and the Carrier Mixed Mail (CARMM) processing described in USPS-LR-K-9, section VII, part G. (This is a convenient stage in the cost processing for calculating CVs for the costs' sampling variation due to IOCS.) The CARMM costs are also the segment 6.1 costs reported in witness Meehan's Exhibit USPS-9A. The mail processing costs reported in Table 1 are subjected to further adjustments in the CRA model, and it would be appropriate to use witness Meehan's reported segment 3.1 costs from Exhibit USPS-9A. For

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

TY 2006, costs should be obtained from the segment 3.1 and 6.1 subclass costs reported in witness Waterbury's Exhibit USPS-10D.

b.-c. Subclass-level unit volume-variable costs may be interpreted as economic marginal costs. For discussion and derivation of the result, please see USPS-LR-K-1, Appendix H.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-10.
a. Please state whether you would characterize the kind of costing described in your testimony and shown in your Tables 1 and 2 as (i) short run costing, or (ii) longer run costing, and explain the basis for your answer.
b. Please explain whether you view the Postal Rate Commission as supporting short run or longer run costing.

Response.

Please note that the mail processing cost methodology underlying witness Shaw's Table 1 is described in the testimonies of witness Bozzo (USPS-T-12) and Van-Ty-Smith (USPS-T-11); see also the response to VP/USPS-T2-2(c)-(e).

a. The Postal Service's costing methods employ base year volume-variable costs intended to reflect actual operating conditions in the base year, and test year volume-variable cost estimates that reflect the actual costs that will prevail given (among other things) anticipated operational changes and cost reduction programs implemented over the "rate cycle." In this sense, they are neither "short run" nor "long run" costing. They are designed to be consistent with the Commission's requirements for volume variable cost as they were stated by the Commission in its Opinion and Recommended Decision in Docket No. R97-1

b. The Commission has stated its requirements for the volume-variable costs that it relies upon: [1]

> The Commission's requirement for volume-variable costs does not coincide precisely with the standard economic definitions of either short-run variable costs or long-run

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[1] See, PRC Op., Docket No. R87-1, Vol. 1, at 206.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

> variable costs. Instead, the Commission applies a definition of variable costs described in R87-1 as "longer" run and encompassing responses of costs to volumes that might require as long to occur as a complete rate case cycle lasting approximately three to four years. PRC Op. R87-1, paras. 3527-3531.

Moreover, the Commission explained its basis for this determination:[2]

> The Commission's understanding of the time period that is appropriate for volume-variable cost analyses is that the volume-variability of costs should reflect the length of time that the Commission's recommended rates would be expected to be in effect. This position is consistent with the testimony of Postal Service witnesses Baumol and Panzar in Docket Nos. R87-1 and R90-1. See Response of witness Bradley to POIR No. 4, Question 1. The Commission was advised to adopt the position that marginal costs should be "actual" marginal costs as they arise over the span of time in which a set of rates are in force. This span of time is the length of a rate cycle, which historically has been approximately three years. Witness Bradley is correct when he asserts that this position corresponds to the economic definition of "short run" rather than "long run" cost. The usual economic definition of long run costs is that they are the costs that arise when all inputs are variable. If some inputs are variable, but others are not, then costs are short run. However, there are many flavors of short run depending upon what inputs can be varied over the length of time considered. Witness Bradley's operational definition given in his response to P.O. Information Request No. 4 is consistent with the Commission's view of the correct time period for postal cost studies. "One should attempt to base prices on the marginal costs that will actually be incurred by the firm to serve a sustained increase in volume over the time period during which the prices will be in effect." Tr. 11/5417-18.

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[2] See, PRC Op., Docket No. R97-1, Vol. 1, at 79-80.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-11.

a. Do you believe costing of the kind described in your testimony is consistent with past testimony before the Postal Rate Commission by Postal Service witnesses such as Baumol, Panzar, Ordover, Bradley, and Vickery [sic]?
b. If your answer to preceding part a is affirmative, please provide quotations from the testimony of these witnesses that supports the kind of costing you present in your testimony.

Response.

a. Yes, assuming "costing" refers to the cost methods underlying the estimates reported in witness Shaw's Tables 1 and 2.

b. The entire testimonies of the economists you list are consistent with and supportive of the Postal Service's cost methodology. These witnesses have testified on a wide range of issues that are incorporated into the Postal Service's analyses. Since the question does not raise any specific costing issue, here is a sample of statements from the witnesses mentioned.

Prof. Baumol's Docket No. R87-1 testimony concludes:

> The public welfare requires rates to be based on marginal (variable) costs and demand considerations. (Docket No. R87-1, USPS-T-3 at 50.)
>
> The costs directly pertinent to decisions in reality, that is, the actual consequences of those decisions, are, consequently, the costs somewhat misleadingly referred to as "short run..." The pertinent variable (marginal) costs do not incorporate all the costs of the enterprise, either in the short run or the long, and their response to output changes can only be evaluated by painstaken [sic] econometric analysis, either cross sectional or time series in character. (*Id.?*)

See also Docket No. R87-1, USPS-T-3 at 25-27 for a fuller discussion on the reasons for basing prices on marginal costs.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

Prof. Panzar:

> The starting point for any pricing analysis is the (vector of) marginal costs of the enterprise's services. The crucial role of marginal costs in rate-making has long been emphasized in testimony before this Commission and I will not repeat those arguments in detail here. However, the detailed costing procedures of the Postal Service are based on the concept of volume variable costs, not the marginal costs of economic theory. Thus one important goal of my testimony is to explain the linkage between the service specific volume variable costs produced by the Postal Service's system of cost accounts and economic marginal costs. (Docket No. R97-1, USPS-T-11 at 5.)

> However, the marginal costs of the various services are essential information for the implementation of any rational pricing policy. This is a logical consequence of the break-even requirement. Whatever goals the rate-maker wishes to pursue via the prices of various subclasses of mail, they can be pursued effectively only by taking cognizance of the marginal costs of expanding or contracting the relevant mail volumes. (*Id.* at 7.)

> The benchmark cost concept used in postal rate cases is unit volume variable cost. The purpose of this section is to explain why the unit volume variable cost values produced by the Postal Service cost measurement system are valid estimates of mail service marginal costs. (*Id.* at 21.)

Prof. Panzar explains the general calculation of volume variable costs and shows the equality of unit volume variable costs to marginal costs and the assumptions necessary for this. Prof. Panzar concludes:

> That is, the per unit volume variable costs of mail service j are precisely equal to the marginal costs of that service derived from the Postal Service operating plan I have described! (*Id.* at 23.)

Prof. Ordover:

> Prof. Ordover's R84-1 rebuttal testimony concerned the proper pricing approach for the recovery of "fixed costs." He describes the use of incremental and stand-alone costs to check for cross subsidy.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

Prof. Bradley:

He explains the fundamental costing methodology employed by the Postal Service, describes what it measures, and demonstrates the equivalence with marginal costs (Docket No. R2000-1, USPS-T-18 at 44):

> The fundamental goal of the costing algorithm is to calculate volume variable (attributable) cost by class of mail. The volume variable costs are defined by the product of the accrued cost in the cost component (C_i) and the volume variabilities of the classes handled in the component (ε_{ij}).

and:

> Fortunately, volume variable costs can still be measured even when it is impractical to measure volume at the component level. If it is possible to measure a cost driver at the component level, then the cost driver approach can be used to calculate volume variable costs. This method, also known as the "volume variability/distribution key" method employs a costing algorithm in which the assignment of costs to products is broken into two steps. The first step identifies the pool of total volume variable costs and the second step distributes the volume variable costs to the individual products that caused them.

and:

> It is easy to show that this assumption also ensures equivalence between unit volume variable costs, measured in this way, and marginal cost. Marginal cost is simply the derivative of cost with respect to the volume of the class being organized.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

Please see also the response to VP/USPS-T2-10(b) and Prof. Bradley's response to OCA/USPS-T14-2(b).

Prof. Vickrey:

> The USPS costs have key features that are characteristic of properly defined marginal costs. They have some conceptual shortcomings as marginal costs, but these shortcomings may well be unimportant. Recognizing the practical problems involved in measuring marginal costs, I believe the USPS attributable costs can be used as suitable basis for ratemaking at this time. However, I think that there is a need for research and analysis to determine whether any of the conceptual weaknesses are important. (Docket No. R74-1, USPS-RT-3, Section IV.)

Prof. Vickrey argues against the use of long run marginal costs in his rebuttal testimony in R74-1, part IV under the heading "Appropriate Time Period for Costing" where he states:

> In addition, I am unwilling to consider as part of the relevant marginal costs any changes in cost related to changes in volume or other cost factors that occur independently of the rate decision. In my view, the costs that are relevant for rate decisions are only the costs that can be affected, directly or indirectly by rate decisions. (*Id.*)

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORIES OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-15.

a. For the circumstances described by the hypotheticals in VP/USPS-T2-10 and 11 [sic], please (i) identify and briefly describe any theory in the economics literature, as well as (ii) specific references to such literature that espouse or support the kind of IOCS costing described in your testimony.
b. The economics literature contains and describes many different ways to classify costs; *e.g.*, fixed cost, sunk cost, variable cost, marginal cost, avoidable cost, etc. Please indicate which classification best describes the costs generated by the IOCS.

Response:

a. The cost methods described in USPS-LR-K-1, Appendix H, are consistent with general treatments of multi-product cost and production theory; see, e.g., Robert G. Chambers, *Applied Production Analysis* (Cambridge University Press, 1989), pp. 250-301. See also the testimony of witness Christensen, Docket No. R97-1, Tr. 34/18217-18227.

In contrast to the circumstances of the hypotheticals in VP/USPS-T2-12 and 13, Postal Service costing methods do not presuppose persistent processing capacity constraints.

b. Please see the response to VP/USPS-T2-3(b)-(c).

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.,
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-20. The table below is reproduced from page 73 of the Data Quality Study (April 16, 1999) prepared for the Postal Service by A. T. Kearney, Inc. Please update the table with corresponding data, prepared on a consistent basis, for Base Year 2004.

Table 8.2.1 – % of IOCS Tallies by Tally Category

	Processing Environment – % of IOCS Tallies		
IOCS Tally Category	**Manual**	**Mechanized**	**Automated**
	1969	1986	1996
Specific Mail Product Identified	77	63	45
Mixture or Group of Mail Identified	17	8	6
No Mail Identified	6	29	49

RESPONSE:

Updated Table 8.2.1 - % of IOCS Tallies by Tally Category

	Processing Environment – % of IOCS Tallies			
IOCS Tally Category	**Manual**	**Mechanized**	**Automated**	**Automated**
	1969	1986	1996	2004
Specific Mail Product Identified	77	63	45	43
Mixture or Group of Mail Identified	17	8	6	7
No Mail Identified	6	29	49	50

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.,
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-21 . The Data Quality Study (April 16, 1999) prepared for the Postal Service by A. T. Kearney, Inc. states at page 38 that the Postal Service spends "$12.5 million for IOCS field data collection efforts alone."

a. In Base Year 2004, how much did the Postal Service spend for IOCS field data collection efforts alone?

b. In Base Year 2004, how much did the Postal Service spend for all other IOCS related efforts (*e.g.*, data editing, data processing, etc.), in addition to field collection efforts covered by preceding part a?

RESPONSE:

a. Approximately $14.6 million.

b. The Postal Service does not track or calculate the administrative costs on a system by system basis.

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.,
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-25. Please refer to the institutional response to VP/USPS-T2-20 (redirected from you to the Postal Service). For Base Year 2004, and for each MODS pool, please provide the following information:

a. The total number of IOCS tallies separately for each MODS pool.

b. The percentage of tallies in each MODS pool for which (i) a specific mail product was identified, (ii) a mixture or group of mail was identified, and (iii) no mail was identified.

c. For all other IOCS tallies in Cost Segment 3, a summary showing the number of such tallies, and for these other tallies the percentage for which (i) a specific mail product was identified, (ii) a mixture or group of mail was identified, and (iii) no mail was identified.

RESPONSE:

Table 1 below identifies the information requested from VP/USPS-T2-25 a-c and VP/USPS-T2-27 (i) – (iii).

Table 1

	Weighted Tallies			
Cost Pool	Mail Product Identified	Mixed Mail	No Mail Identified	Unweighted Records
BCS/	54%	4%	42%	1,811
BCS/DBCS	56%	3%	40%	15,282
OCR/	57%	3%	41%	2,611
AFSM100	54%	4%	43%	6,066
FSM/	40%	4%	56%	100
FSM/1000	57%	3%	40%	2,637
MECPARC	57%	7%	37%	102
MPLSM	56%	0%	44%	2
SPBS OTH	44%	6%	50%	4,973
SPBSPRIO	50%	8%	42%	1,163
1SACKS_M	22%	9%	68%	379
1TRAYSRT	30%	11%	59%	1,550
MANF	60%	4%	36%	3,139
MANL	64%	2%	34%	11,310
MANP	42%	7%	52%	905
PRIORITY	46%	7%	47%	2,716
LD15	54%	0%	46%	263
1CANCEL	47%	8%	45%	3,988
1DSPATCH	24%	14%	62%	2,692
1FLATPRP	47%	10%	42%	3,094
1MTRPREP	44%	8%	48%	407

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.,
REDIRECTED FROM WITNESS SHAW

1OPBULK	36%	9%	55%	2,449
1OPPREF	31%	12%	57%	6,004
1OPTRANS	17%	20%	63%	1,541
1PLATFRM	9%	18%	73%	16,490
1POUCHNG	39%	6%	55%	1,763
1PRESORT	28%	4%	69%	778
1SACKS_H	22%	16%	62%	1,533
1SCAN	25%	10%	65%	1,215
BUSREPLY	56%	2%	42%	541
EXPRESS	34%	3%	63%	1,697
MAILGRAM	35%	0%	65%	48
REGISTRY	33%	7%	60%	2,170
REWRAP	41%	1%	59%	309
1EEQMT	3%	4%	93%	383
1MISC	18%	3%	79%	2,813
1SUPPORT	6%	1%	93%	3,421
LD49	58%	2%	40%	3,633
LD79	21%	1%	78%	1,266
PMPC	30%	15%	56%	2,173
INTL ISC	32%	17%	51%	7,421
BMC Mail Proc	34%	13%	54%	11,522
Non-MODS Mail Proc	53%	5%	42%	29,520
Subtotal Mail Processing	43%	7%	50%	163,880
Window Service	17%	0%	82%	20,293
Other (incl. Administrative)	2%	0%	97%	14,038
Total Clerk/Mail Handler	36%	6%	58%	198,211

INSTITUTIONAL RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.,
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-27. Please refer to the institutional response to VP/USPS-T2-20. In the same format used there to classify IOCS tallies — *i.e.*, (i) specific mail product identified, (ii) mixture or group of mail, or (iii) no mail identified — please provide the total number of IOCS tallies for each MODS cost pool in Cost Segment 3, and either the percentage breakdown or the actual number of tallies within each cost pool according to the above classification. In your response, please include an "all other" category for any tallies not in a MODS cost pool, so that the total number of tallies is equal to the entire set of tallies used to develop mail processing costs in Cost Segment 3.

RESPONSE:

Please see the response to VP/USPS-T2-25, Table 1.

INSTITUTIONAL RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC.,
AND VALPAK DEALERS' ASSOCIATION, INC.,
REDIRECTED FROM WITNESS SHAW

VP/USPS-T2-30.
The Data Quality Study (April 16, 1999), which was prepared for the Postal Service by A. T. Kearney, Inc., recommended (at p. 41) that one option for improving distribution key share data for MODS costs pools would be to replace the IOCS with a new sampling system that measures the actual concept of interest. What consideration is the Postal Service giving to this recommendation? Please describe any steps that have been taken in that regard.

RESPONSE:

The Data Quality Study offered two alternatives for improving "distribution key share" data for mail processing. Option A was to "Replace IOCS with a new sampling system that measures the actual concept of interest," and Option B was to "Retain IOCS with additional sub-sampling of mixed mail." Data Quality Study Summary Report at 42. The Summary Report further noted that "the study team did not conduct an exhaustive cost-benefit analysis for the replacement of IOCS." (Id.)

As part of its review of this Data Quality Study recommendation, the Postal Service weighed both options. The Study characterized Option A as requiring the Postal Service to: "Define the cost drivers for each MODS cost pool; and [ ] [d]efine a sampling system to collect the appropriate distribution key data for each cost pool." Id. at 41. For the mail distribution cost pools where the Postal Service's econometric models define piece handlings as the formal cost drivers, the Postal Service concluded that existing IOCS sampling procedures, with minor modifications, already collected information on the quantities of interest.

While the Study suggested sampling the output bins of barcode sorters rather than the mailpiece in an operator's hand, IOCS sampling procedures already yielded either a mailpiece in hand or a mailpiece from the input or output of a machine. That is,

IOCS draws a sample of pieces from the mailflow through a given cost pool at random intervals given by the sampled instants of work time. The Postal Service's conclusion was that IOCS substantially met the requirements of Option A.

One apparent attraction of sampling output bins was the sampling of more mail pieces. However, obtaining more mail pieces per test would not necessarily improve sampling precision materially since most variation is captured between tests, rather than within a test.

The necessity of obtaining information on allied labor cost drivers such as container handlings, where "output" sampling is inapplicable or impractical, led to close consideration of the Study's Option B.

In evaluating costs and benefits of the options, the Postal Service determined that the existing IOCS sampling procedure has a substantial benefit in that it automatically assigns larger shares of sample observations to operations with relatively large labor costs, and does not require expert attention and redirection of sampling resources away from declining operations and towards growing ones. An alternative such as the machine output sampling suggested by the Study would require substantial effort by Postal Service analysts to monitor equipment deployments and usage to ensure sample observations were directed appropriately. Otherwise, it is possible that data collectors in an alternative system could discover that equipment scheduled for sampling had been decommissioned (e.g., FSM 881) while the replacing equipment (e.g., AFSM 100) was not being sampled.

Last, the Postal Service considered that in addition to ratemaking data, IOCS provides valuable data outside of its ratemaking use (developing costs by subclass)

since it routinely collects detailed data on the actual work activities of employees in the sampled crafts. Losing this information in the process of turning IOCS into a vehicle suited only to collection of subclass distribution key data would hamper understanding of Postal Service operations and, indirectly, our ability to defend cost methods and results. In this light, the Postal Service disagrees with the Study's contention that data for "not handling" observations are "discarded" (id. at 42) and thus constitute an inefficiency of IOCS.

The Postal Service thus chose to retain IOCS and revamp the IOCS data collection instrument to provide for greater consistency between current operations and employee activity questions, to increase the accuracy of recorded mailpiece data, and to obtain additional information for mixed-mail observations as called for by the Study's Option B. *The Postal Service is also continuing to study methods by which mixed-mail* data may be further improved.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS CUTTING

VP/USPS-T26-3. Please refer to USPS-LR-K-107, file LR-K-107.xls, which develops mail processing costs for Standard ECR mail at Commission costing, and for each of ECR Automation letters, ECR Basic (LOT) letters, and ECR High Density/Saturation letters on spreadsheet 'Summary TY Data' performs the following operations: (i) divide the dollar figures for each cost pool on the appropriate lines (meaning the auto line 16, the Basic line 6, and the WSS/H line 11) by the total cost at the end of the same line, thereby obtaining the proportions of the mail processing cost for each of the three letter categories that come from the cost pool in each column; and (ii) divide the dollar figures for each cost pool on the same lines by the corresponding TY Volume in column D of spreadsheet 'Results,' thereby obtaining the amount of cost (expressed below in cents per piece) that each of the three letter categories picks up from the cost pool in each column.

a) Please consider the following results selected from the results described in the introduction to this question, for the cost pool "N Allied."

Cost Pool: N Allied		
Category	Proportion of cost of category	Cost in cents
Auto Letter	2.34%	0.03
Basic Letter	8.51%	0.28
HD/Saturation Letter	15.55%	0.13

(i) Please explain the nature of the N Allied cost pool.
(ii) Please explain why it is reasonable and to be expected that High Density/Saturation letters should get 0.13 cents of costs from this pool (15.55 percent of their total mail processing cost) and that Automation letters should get only 0.03 cents of costs from this pool (2.34 percent of their total mail processing cost).
(iii) If you do not believe this is reasonable and to be expected, please explain what outcome would be more reasonable.

b) Please consider the following results selected from the display outlined in the introduction in this question, for the cost pool "1OPPREF."

Cost Pool: 1OPPREF		
Category	Proportion of cost of category	Cost in cents
Auto Letter	3.05%	0.04
Basic Letter	2.76%	0.09
HD/Saturation Letter	8.16%	0.07

(i) Please explain the nature of the 1OPPREF cost pool.
(ii) Please explain why it is reasonable and to be expected that High Density/Saturation letters should get 0.07 cents of costs from this pool (8.16 percent of their total mail processing cost) and that Automation letters should get only 0.04 cents of costs from

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS CUTTING

this pool (3.05 percent of their total mail processing cost).
(iii) If you do not believe this is reasonable and to be expected, please explain what outcome would be more reasonable.

c) Please consider the following results selected from the display outlined in the introduction in this question for the cost pool "BCS/DBCS."

Cost Pool: BCS/DBCS		
Category	Proportion of cost of category	Cost in cents
Auto Letter	20.92%	0.29
Basic Letter	19.99%	0.66
HD/Saturation Letter	32.83%	0.27

(i) Please explain the nature of the BCS/DBCS cost pool.
(ii) Please explain whether the fact that Automation letters and High Density/Saturation letters pick up 0.29 cents and 0.27 cents of cost respectively from the BCS/DBCS cost pool indicate that approximately the same proportion of each of these two letter categories is delivery point sequenced. If this is not a correct or reasonable inference, please explain what conclusion can be drawn.
(iii) For Automation letters and High Density/Saturation letters, what proportion of each were delivery point sequenced in the base year?
(iv) How much cost would you expect a piece to incur if it were delivery point sequenced? If you do not know, please provide your best estimate and explain the basis for it.
(v) For Automation and High Density/Saturation letters that are delivery point sequenced, can you identify any reason why their delivery costs should be different? Please explain.
(vi) For Automation and High Density/Saturation letters, please quantify the reduction in delivery costs that you would expect as a function of the proportion of the respective volume of each that is delivery point sequenced.

RESPONSE:

(a)(i) The "N_Allied" cost pool represents an assortment of clerk and mail handler allied labor activities performed at non-MODS facilities. Some common examples of allied labor activities at non-MODS facilities include moving mail between operations, prepping mail for manual or automation sortation operations, and platform work such as loading and unloading vehicles.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS CUTTING

(a)(ii)-(iii) Although the analysis in USPS-LR-K-107 is based on over 1,400 Standard Mail ECR IOCS tallies, using them to infer cost differences by rate category and shape at the level of an individual cost pool can be misleading. Sampling variation within IOCS is likely to be the primary driver for cost differences observed in many individual cost pools, especially cost pools where mail is being handled in bulk. A more meaningful exercise is to consider the costs for each disaggregated category after grouping cost pools together by facility type, major operation type (e.g., auto, manual) or processing category (e.g., letter operations, flat operations). For an example, see the response to VP/USPS-T-26-2h(i), which segments costs between DBCS/DIOSS processing (a collection of three different cost pools) and all other activities.

(b)(i) The "1OPPREF" cost pool represents opening units of preferred mail within MODS facilities. Opening units are operations within processing facilities where containers of mail are opened and prepared for distribution, or closed and prepared for dispatch.

(b)(ii)-(iii) Please see the response to VP/USPS-T26-3(a)(ii)-(iii).

(c)(i) The "BCS/DBCS" cost pool represents automated sortation operations on DBCS and DIOSS machines in MODS facilities. These machines are used for outgoing processing, incoming primary sortation, and delivery point sequencing (DPS).

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO
INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS CUTTING

(c)(ii) Assuming that both ECR categories require about the same amount of cost per handling, the similarity of the unit costs does suggest that about the same portion of volume of each category is flowing through the BCS/DBCS cost pool. This does not necessarily mean that the same proportion of these categories is being delivery point sequenced. This is because not all activities within the BCS/DBCS cost pool are devoted exclusively to DPS processing, and DPS processing occurs in other cost pools besides BCS/DBCS.

(c)(iii) Please refer to USPS-LR-K-67.

(c)(iv) Although it is generally understood that the Postal Service has continued to shift additional Standard Mail ECR letters into the DPS mail processing stream, we have no estimates of how this shift affects ECR mail processing costs.

(c)(v) As long as the pieces in both categories are automation compatible, they should have the same unit cost for DPS processing.

(c)(vi) Please see the response to VP/USPS-T26-3(c)(iv).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-23.

Please refer to the "COST" spreadsheet of workbook USPS-LR-J-131-WP1.xls, Docket No. R2001-1, containing mail processing and delivery costs (in cents per piece) for various rate categories of Standard ECR mail, on which the current rates are based, the relative levels of which are being perpetuated by the Postal Service's across-the-board proposal in the instant docket.

a. Please describe the mail processing received by Saturation flats leading to the cost of 1.152 cents, including a general outline of the steps through which the cost is developed and what proportion of Saturation flats receive each processing step.

b. Please describe the mail processing received by High Density flats leading to the cost of 1.152 cents, including a general outline of the steps through which the cost is developed and what proportion of High Density flats receive each processing step.

c. Please describe the mail processing received by Basic flats leading to the cost of 3.331 cents, including a general outline of the steps through which the cost is developed and what proportion of Basic flats receive each processing step.

d. Drawing on the descriptions you provided in response to parts a through c of this question, and supplementing them as needed, please explain why Basic flats receive 2.891 (3.331/1.152) times as much mail processing cost as either High Density or Saturation flats, including why it is that High Density and Saturation flats receive exactly the same amount of mail processing. Where appropriate, please include references to the effect of pieces-per-bundle, any effects of dropshipment by mailers, and third-bundle treatment discussed in the testimony of Postal Service witness Jeffery W. Lewis (USPS-T-30, Section 2.2, pp. 2-3).

e. Please describe of how the mail processing cost for Saturation flats of 1.152 cents picks up and accounts for the mail processing costs of any Detached Address Labels ("DALs") accompanying the flats, including the proportion of the flats that have such labels. If any of the cost of 1.152 cents is for bundle sorts of flats, please include a discussion of the nature of the equivalent sorts received by any associated DALs.

RESPONSE:

(a)-(c) Mail processing encompasses all clerk and mail handler activities associated with distribution of mail, allied labor operations, and miscellaneous work (including mail processing support activities). For the purposes of cost analysis, these activities are grouped into distinct mail processing cost pools. Mailers present Standard ECR flats as

bundles loaded on pallets or in sacks. Depending on the presort and drop-ship levels of the container, clerks and mail handlers perform a variety of container and bundle sorting activities to move the mail to the destination carrier route. Container handling activities take place in plants and BMCs (particularly in the 1PLATFORM, BMC PLA, BMC OTH, and 1OPTRANS cost pools) as well as in delivery units (non-MODS ALLIED). Container break-down and bundle and sack sorting operations take place in plants, BMCs, and delivery units (including the MECPARC, 1SACKS_M, 1SACKS_H, SPBSOTH, SPBSPRIO, 1OPBULK, 1OPPREF, 1POUCHING, BMC SPB, BMC SSM, and non-MODS Allied cost pools). Some individual piece sorting may be required for broken bundles.

Container handling activities at upstream facilities will typically be avoided by mail drop-shipped to the destinating BMC or plant, and plant and BMC operations in their entirety will typically be avoided by mail drop-shipped to the destinating delivery unit. However, it is not possible as a general matter to specify the proportion of ECR flat volume handled in each processing step.

The test year costs by cost pool for each ECR rate category and shape are reported in the "Summary TY Data" worksheet of the "LR-J-59.xls" workbook as found in USPS-LR-J-59. The procedures for the derivation of these cost estimates as well as the resulting unit cost estimates are described in USPS-LR-J-59 and the response to VP/USPS-T26-2(c).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

(d) The final unit cost values in USPS-LR-J-59 were adjusted to control for the effects of differing drop-ship entry profiles. Hence, the mail processing unit cost differential between basic ECR flats and saturation/high density ECR flats is tied to factors other than drop-shipping. Saturation and high density ECR flats are likely to be in containers that are more finely presorted than containers of basic ECR flats. Accordingly, containers of high-density and saturation ECR flats will tend to be handled intact deeper into the mail processing system, and thus will require fewer bundle sorts. Also, because of differing presort requirements, the average bundle size is larger for saturation/high density ECR flats than for basic ECR flats, so the cost per piece of bundle handlings will tend to be lower for saturation/high-density ECR than for basic ECR, other things equal. In light of the bundle and container sorting activities needed for ECR flats, both of these factors could have an important impact on mail processing costs when measured on a per-piece basis.

Please note that separate unit costs for high-density and saturation ECR flats were not estimated in USPS-LR-J-59; the measured high-density and saturation costs are identical because the categories were pooled.

(e) If a selected employee's activity at the time of an IOCS reading is associated with a detached address label (DAL), the data collector uses the parent piece to determine shape. Hence, the costs associated with handling DALs accompanying saturation ECR flats would be included in ECR flat costs. The Postal Service has no data system that measures the volume of saturation ECR flats accompanied by DALs.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

As noted in witness Kingsley's response to VP/USPS-T39-1-2 in Docket No. R2001-1, the operational standard at the time the unit costs were developed in USPS-LR-J-59 was to ensure that DALs remained with their host pieces during mail processing activities. DALs were unlikely to be separated from their host pieces and processed as individual pieces, such as being processed on letter automation equipment. Hence, the mail processing activities associated with saturation ECR flats and their accompanying DALs were likely to include keeping pieces and DALs in close proximity to one another.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-24.
Please refer to the "COST" spreadsheet of workbook USPS-LR-J-131-WP1.xls, Docket No. R2001-1, containing mail processing and delivery costs (in cents per piece) for various rate categories of Standard ECR mail, on which the current rates are based, the relative levels of which are being perpetuated by the Postal Service's across-the-board proposal in the instant docket.
a. Footnote 2 on the referenced spreadsheet indicates that the costs of delivery (column G) come from USPS-LR-J-59. Please provide details concerning the files and the specific locations in USPS-LR-J-59 of each delivery-cost figure.
b. Please provide a breakout of each of the seven delivery-cost figures into a city delivery component and a rural-delivery component, indicating the weights given to each. Then, for the city-carrier component, to the extent applicable, please break out the figures into an in-office portion and a street portion.
c. The following questions concern the delivery cost of 6.070 cents for Basic flats and 4.862 cents for High Density flats.
(i) Please identify and discuss all reasons for the two costs being different.
(ii) To the extent that differences in the two costs reflect the amount of carrier time incurred, please indicate the wage rates on which the figures are based.
(iii) Please discuss the extent to which these costs are properly viewed as marginal costs. In the case of the High Density figure of 4.862 cents, for example, if the High Density discount were to be increased and the volume of High Density flats were to increase according to the appropriate elasticity, would you expect the unit additional cost associated with these additional pieces to be 4.862 cents? Please explain your answer.
(iv) If you indicate that each cost figure is a marginal cost, please outline all of the assumptions which must be made in order to justify the marginal conclusion. If you do not so indicate, please present and discuss the costing theory underlying the nature of these costs.

Response

a. The source of the delivery costs in column G of the 'COST' worksheet is not LR-J-59. It is instead "LR-J-117_revised.xls", worksheet 'summary TY', cells O85-O88 and O101-O103.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

b. The breakouts requested for the LR-J-131 TY delivery costs are in the following table.

ECR Shape/Rate Subcategory	Total City Plus Rural Delivery Cost Per Piece	Total City Delivery Cost Per Piece	City In-Office Delivery Cost Per Piece	City Street-Time Delivery Cost Per Piece	Total Rural Delivery Cost Per Piece
	(1)	(2)	(3)	(4)	(5)
ECR Letters					
Auto	4.596	1.876	0.457	1.419	2.720
Basic	6.384	4.103	2.377	1.726	2.282
High Density	4.684	3.405	1.776	1.630	1.279
Saturation	3.374	2.096	0.646	1.449	1.279
ECR Non-Letters					
Basic	6.070	4.363	2.265	2.098	1.707
High Density	4.862	3.469	1.494	1.975	1.392
Saturation	4.031	2.639	0.778	1.861	1.392

There are no weights involved in the analysis. The unit costs in the above table are all costs per RPW. Thus, the total city delivery costs per piece in column 2 equal the simple addition of the component unit costs in columns 3 and 4. The total city plus rural costs per piece in column 1 likewise equal the sum of the total city and total rural unit costs in columns 2 and 5.

c(i). First, the unit costs referred to in this question were the ECR Basic and High Density nonletters unit costs, not the Basic and High Density flats unit costs. The two main sources of the 25% excess of the 6.070-cent unit cost for Basic nonletters over the 4.862-cent cost for High Density nonletters were the big differences in city in-office direct labor flats costs, and in total rural-carrier flats costs. (Virtually all ECR nonletter costs came from flats). The Basic flats city in-office direct labor and total rural-carrier costs per RPW piece exceeded the corresponding High Density unit costs by 52% and 23%, respectively. (In contrast, the Basic flats total city street-time cost per piece

exceeded the High Density street-time cost per piece by only 6%). This much higher Basic flats city in-office direct-labor cost very likely resulted from the combination of a higher percentage of pieces going through casing operations, and a higher cost per cased piece. Given data limitations, it is not possible to actually quantify these differing casing rates and costs per cased piece. The higher Basic flats total rural cost per RPW piece resulted from the way in which LR-K-117 allocated RCCS ECR Basic flats and High Density flats to the rural evaluation categories. Virtually all Basic flats were allocated to the "flats-delivered" category, which had a BY 2000 cost per delivered piece of $0.0576. Virtually all High Density flats, however, were allocated to the "boxholder" category, which had a 41% lower BY 2000 cost per delivered piece equal to $0.0337.

(ii). The city costs reflect a TY03 city-carrier wage rate of $32.617, listed in cell C34 of "LR-J-117_revised.xls", worksheet 'letters 93'. LR-J-117 does not report a TY03 rural-carrier wage rate. However, the National Payroll Hour Summary Report, Accounting Period 13 – 2003 at page 61 reports a ratio of aggregate annual FY 2003 rural-carrier wages over corresponding workhours equal to $26.284.

(iii). Please see R2005-1, USPS-LR-K-1, Summary Description, Appendix H for an analysis of the conditions under which a total delivery cost per RPW piece, such as the 4.862-cent High-Density cost, can be regarded as a marginal cost. In any event, it is unclear what is meant by the reference in your question to High-Density flats volume that increases "according to the appropriate elasticity". As a marginal cost, the 4.862 cents only measures the increase in cost resulting from a one-piece increase in volume.

(iv). Please see the response to c(iii) and R2005-1, USPS-LR-K-1, Summary Description, Appendix H.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-25.
Please refer to the "COST" spreadsheet of workbook USPS-LR-J-131-WP1.xls, Docket No. R2001-1, containing mail processing and delivery costs (in cents per piece) for various rate categories of Standard ECR mail, on which the current rates are based, the relative levels of which are being perpetuated by the Postal Service's across-the-board proposal in the instant docket.
a. Please refer to the delivery cost for Basic (presorted to carrier route) **letters** of 6.384 cents and for Basic (presorted to carrier route) **flats** of 6.070 cents.
(i) What portions of these two costs, if any, are **not** associated with carrier activities?
(ii) At this carrier route presort level, please identify and discuss the reasons why the delivery cost of letters is higher than the delivery cost of equivalently-prepared flats.
b. Please consider that (i) the delivery cost shown for Basic flats is 0.314 (6.384 minus 6.070) cents **lower** than the corresponding cost shown for letters and (ii) the delivery cost shown for High Density flats is 0.178 (4.862 minus 4.684) cents **higher** than the corresponding cost shown for letters.
(i) Please explain the extent to which your general expectation would be that carrier costs decline as the level of preparation and the density of the mail increase, measuring density as the proportion of possible stops on a route that receive mail.
(ii) Please suppose that 1,000 Basic letters were replaced by 1,000 Basic flats, for the same addresses on the same routes, and that the addresses and routes are typical and representative. Would you expect a **decline** in postal costs in the amount of $3.14 (1,000 times 0.314 cents)? If you would not, please explain what cost change you would expect, stating all assumptions made and drawing on the characteristics of the mail involved and the work to be performed.
(iii) Please suppose that 1,000 High Density letters were replaced by 1,000 High Density flats, for the same addresses on the same routes, and that the addresses and routes are typical and representative. Would you expect an increase in postal costs in the amount of $1.78 (1,000 times 0.178 cents)? If you would not, please explain what cost change you would expect, stating all assumptions made and drawing on the characteristics of the mail involved and the work to be performed.
(iv) Please explain any extent to which you do not agree that for typical and representative routes, the fundamental difference between a mailing (letters or flats) qualifying for the Basic (presorted to carrier route) rates and a mailing qualifying for the High Density rates is that the mailing qualifying for the High Density rates has more pieces per route. If you do not agree, please explain all reasons for disagreeing.
(v) Drawing on the characteristics of the mail involved and the work to be performed, please provide a narrative explanation of all of the reasons why, compared to High Density letters, High Density flats cost **more** for carriers to process and deliver while, compared to Basic letters, Basic flats cost **less** for carriers to process and deliver.

Response

a.(i) All portions of both costs are associated strictly with carrier activities.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

(ii) First, the 6.070 cost referred to in this question is really the cost for ECR Basic nonletters, not ECR Basic flats. The primary reason for the 5% excess of the Basic letters total delivery cost per RPW (6.384 cents) over this Basic nonletters total delivery cost per RPW is the 34% excess of the Basic letters rural-carrier cost per RPW over the corresponding Basic nonletters rural cost. Moreover, the source of this 34% excess lays entirely in the much higher Basic-letters ratio of RCCS pieces to RPW pieces.

The significance of this much higher volume ratio is made apparent when the LR-J-117 rural-carrier costs per RPW are expressed as the product of this ratio and the rural costs per RCCS piece. For Basic letters, the TY rural cost per RPW equaled 1.833 cents, which equaled an RCCS-to-RPW volume ratio of 0.375 times a rural cost per RCCS piece of 4.891 cents. For Basic nonletters, the TY rural cost per RPW equaled only 1.371 cents, which equaled an RCCS-to-RPW volume ratio of only 0.230 times a rural cost per RCCS piece of 5.956 cents.

Thus, the Basic nonletters rural cost per RCCS, at 5.956 cents, was actually higher than the corresponding 4.891-cent Basic letters cost. It was only because this 5.956 cents was multiplied by a low 0.230 ratio of RCCS Basic nonletters to RPW Basic nonletters that it translated into a low 1.371 cents per RPW piece. In contrast, the much lower 4.891-cent Basic letters cost per RCCS – as compared with the nonletters cost per RCCS - translated, via the high 0.375 ratio of RCCS Basic letters to RPW Basic letters, into a correspondingly high 1.833 cents per RPW.

To see why this result is so critical, suppose the Basic nonletters RCCS-to-RPW ratio had equaled the same 0.375 that it equaled for letters. Then the TY rural Basic nonletters cost per RPW would have equaled 0.375 times 5.956 cents, or 2.232 cents,

which would have been 22% higher than the 1.833-cent rural Basic letters cost per RPW. This 22% excess would, in turn, have caused the TY Basic nonletters total delivery cost per RPW (including piggybacks) to increase from 6.070 cents to 7.142 cents, which would have been 12% higher than the 6.384-cent TY Basic letters total delivery cost (including piggybacks) per RPW.

b(i) As the level of preparation increases, the expectation is that carrier costs per RPW would decline, since increased preparation should cause reductions in the percentages of pieces that go through city in-office casing, and in the costs per cased piece. However, it would not be expected that an increase in the proportion of possible stops that receive mail would also reduce the LR-J-117 carrier costs per RPW. The total "LR-J-117_revised.xls" TY city-carrier route, access, and load-time costs per RPW piece (from columns F-H and L of 'summary TY') are the same for Basic letters as they are for High Density letters. The corresponding unit costs for Basic flats are likewise the same as the High Density flats unit costs. These results suggest that the LR-J-117 costing methodology does not reduce street-time costs per piece in response to increases in stop coverages.

(ii). Assuming solely for the sake of this question that the LR-J-117 costing methodology were correct, and assuming that the $3.14 cost differential applies to all 1,000 pieces, it would be expected that the substitution of 1,000 Basic flats for 1,000 Basic letters would cause a $3.14 decline in total costs.

(iii). Yes, subject to the same assumptions stated in the response to question 25 b(ii).

(iv). Agreed.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

(v). High density flats cost more for carriers to deliver than High Density letters because city street-time costs per delivered piece and total rural costs per delivered piece are higher for flats than for letters. Observe, also, that because the LR-J-117 ratios of CCS to RPW pieces and RCCS to RPW pieces did not differ substantially between High Density flats and High Density letters, this excess of the High Density flats cost per delivered piece over the High Density letters cost translated into correspondingly higher LR-J-117 base year and test year flats costs per RPW piece.

As explained in the response to question 25a(ii), the LR-J-1117 cost per delivered piece was also greater for Basic nonletters (most of which are flats) than for Basic letters, and this was the case for the same reason that the High Density flats costs per delivered piece exceeded the High Density letters cost per delivered piece. This result is confirmed by the finding that, had the Basic-nonletters RCCS to RPW volume ratio equaled the Basic letters ratio, LR-J-117 would have computed a TY Basic nonletters total delivery cost per RPW equal to 1.12 times the Basic letters total delivery unit cost. The only reason LR-J-117 reported lower TY total delivery unit costs for Basic nonletters than for Basic letters was that the actual LR-J-117 TY ratio of RCCS to RPW volume was much lower for nonletters (at 0.230) than for letters (at 0.375).

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-26.
Please refer to the "COST" spreadsheet of workbook USPS-LR-J-131-WP1.xls, Docket No. R2001-1, containing mail processing and delivery costs (in cents per piece) for various rate categories of Standard ECR mail, on which the current rates are based, the relative levels of which are being perpetuated by the Postal Service's across-the-board proposal in the instant docket, and specifically to the delivery cost of Saturation flats, shown to be 4.031 cents.
a. Please discuss the extent to which this cost is properly viewed as a marginal cost.
b. Please suppose the Saturation discount were to be increased and the volume of Saturation flats were to increase according to the appropriate elasticity. Would you expect the unit additional cost associated with these additional pieces to be 4.031 cents? If not, please explain what you would expect the unit additional cost to be.
c. If you indicate that the cost figure of 4.031 cents is a marginal cost, please outline all of the assumptions which must be made in order to justify the marginal conclusion. If you do not so indicate, please present and discuss the costing theory underlying the nature of this cost.

Response

a. and b. Please see R2005-1, USPS-LR-K-1, Summary Description, Appendix H for an analysis of the conditions under which a total delivery cost per RPW piece, such as the 4.031-cent Saturations flats cost, can be regarded as a marginal cost. Also, it is unclear what is meant by the reference in part b of your question to Saturation-flats volume that increases "according to the appropriate elasticity". In any event, as a marginal cost, the 4.031 cents would measure only the increase in cost resulting from a one-piece increase in volume.

(c) Please see the response to parts a. and b. of this question, and R2005-1, USPS-LR-K-1, Summary Description, Appendix H.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-27
Please refer to spreadsheets "COST" and "NCOST" in files USPS-LR-J-131-WP1.xls and USPS-LR-J-131-WP2.xls, respectively, Docket No. R2001-1, which provide cost information behind the current Standard (Commercial) ECR and Standard Nonprofit ECR rates, which are being elevated in this case by application of an across-the-board percentage, 5.6 percent and 5.9 percent, respectively. *See* columns G in both spreadsheets, which contain delivery costs. Please provide a specific source for each delivery-cost cell in both spreadsheets, one being for commercial ECR and the other for Nonprofit ECR. Note that the source shown on the sheet may not be the correct one. Note also that USPS-J-LR-117 is a candidate source, but does not appear to show separate costs for Standard (Commercial) ECR and Standard Nonprofit ECR.

Response

The source of the delivery costs in column G for both the 'COST' worksheet and the 'NCOST' worksheet is USPS-LR-J-117, worksheet 'summary TY', cells O85-O88 and O101-O103. Note, also, that the relevant LR-J-131 workbooks are the errata versions, "lr131e~1.xls" and "lr131e~2.xls", filed on January 3, 2002. These replaced "USPS-LR-J-131-WP1.xls" and "USPS-LR-J-131-WP2.xls".

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF VALPAK, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T-28-38.

Using PRC costing, in Docket No. R2001-1, the cost of Basic automation letters in ECR was 6.514 cents and, in Docket No. R2005-1, it is 6.341 cents, constituting a decline of 2.66 percent. Mail processing costs declined 6.28 percent and delivery costs declined 1.45 percent. For Docket No. R2001-1 costs, see USPS-LR-J-83 (mail processing) and PRC-LR-7 (delivery). For Docket No. R2005-1 costs, see USPS-LR-K-107 (mail processing) and USPSLR-K-101 (delivery).

a. Please confirm the numbers above. In any are incorrect, please make needed corrections, explain the corrections fully, supply corresponding proportionate changes, and answer the remainder of this question based on your corrections.

b. Please identify and discuss all factors accounting for the decline in mail processing costs, such as factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement and in particular how it improves the estimation of marginal cost and volume variable costs.

c. Please identify and discuss all factors accounting for the decline in delivery costs, including factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure idendified, please explain why the change is an improvement, and in particular how well it improves the estimation of marginal cost and volume variable costs.

d. Please explain and quantify the effect that witness Bradley's new carrier analysis (USPS-T-14) had on the delivery cost.

e. With regard to both the mail processing cost and delivery cost, please explain and quantify the effect that increased delivery point sequencing had on the results.

RESPONSE:

a. Confirmed for mail processing. Not confirmed for delivery. The

percentage change is a decline of 1.43 percent rather than 1.45 percent.

b. USPS-LR-J-83 and USPS-LR-K-107 are not structured in a way to readily

reveal how changes in factors prices, productivities, and technology affect the unit cost of the ECR rate category in question. Using the base year mail processing cost of the Standard Mail ECR subclass as a starting point, these studies create de-averaged unit costs by rate category and shape, relying upon key inputs such as IOCS tallies, test year cost and volume ratios, and drop ship cost avoidances. The degree to which the results are affected by changes in factor prices, productivities, and technology is a function of how these changes impact these key inputs, especially changes in mail processing letter operations. For a discussion of the Postal Service's current financial condition and the impact played by changing factor prices, improvements in productivities, and cost reduction programs, please see witness Tayman's testimony (USPS-T-6). For a discussion of the Postal Service's changing mail processing technologies, please see witness McCrery's testimony (USPS-T-29).

The costing methodologies used in USPS-LR-J-83 and USPS-LR-K-107 are the same, with the exception that USPS-LR-K-107 has cost pool controls at the subclass level, but not at the shape level. This difference in methodologies was the result of the production schedule of USPS-LR-K-107, related to the filing of materials for R2005-1.

c. Measured delivery cost can change for three reasons: changes in volume (including changes in mail mix), changes in operations that affect the way mail is delivered or changes in the method of calculation. Changes in the first two will affect the accrued cost for delivery. Changes in the latter affect how much of the accrued delivery cost is attributed to each product. The Postal Service has not

done an analysis of the change in accrued delivery cost and it is therefore not possible to break down the change in accrued cost to the many different reasons it occurred.

d. Witness Bradley's new analysis had no effect on PRC versions presented with the Postal Service's filing.

e. Although it is generally understood that the Postal Service has continued to shift additional Standard Mail ECR letters into the DPS mail processing stream, we have no estimates of how this shift impacts mail processing and delivery costs.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF VALPAK, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-39.

Using PRC costing, in Docket No. R2001-1, at PRC costing, the cost of Basic (nonautomation) letters in ECR was 9.641 cents and, in Docket No. R2005-1, it is 13.125 cents now, constituting an increase of 36.14 percent. Mail processing costs increased 14.86 percent and delivery costs increased 45.69 percent. For Docket No. R2001-1 costs, see USPSLR-J-83 (mail processing) and PRC-LR-7 (delivery). For Docket No. R2005-1 costs, see USPS-LR-K-107 (mail processing) and USPS-LR-K-101 (delivery).

a. Please confirm the numbers above. If any are incorrect, please make needed corrections, explain the corrections fully, supply corresponding proportionate changes, and answer the remainder of this question based on your corrections.

b. Please identify and discuss all factors accounting for the increase in mail processing costs, such as factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how it improves the estimation of marginal cost and volume variable costs.

c. Please identify and discuss all factors accounting for the increase in delivery costs, including factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how it improves the estimation of marginal cost and volume variable costs.
d. Please explain and quantify the effect of witness Bradley's new carrier analysis (USPS-T-14) on the delivery cost.

e. With regard to both the mail processing cost and the delivery cost, please explain and quantify the effect of the increase in delivery point sequencing.

RESPONSE:

a. Confirmed for mail processing. Not confirmed for delivery. The

percentage increase is 45.68 percent rather than 45.69 percent.

b. Please see the response to VP/USPS-T28-38b.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF VALPAK, REDIRECTED FROM WITNESS TAUFIQUE

c. Measured delivery cost can change for three reasons: changes in volume (including changes in mail mix), changes in operations that affect the way mail is delivered or changes in the method of calculation. Changes in the first two will affect the accrued cost for delivery. Changes in the latter affect how much of the accrued delivery cost is attributed to each product. The Postal Service has not done an analysis of the change in accrued delivery cost and it is therefore not possible to break down the change in accrued cost to the many different reasons it occurred. A large portion of the change in unit costs can be explained by the rural crosswalk that is done as part of USPS-LR-K-101. Without the rural crosswalk the unit delivery costs, using PRC methodology, for ECR Basic Nonauto is 7.856 cents rather than 9.694 cents. For the detailed calculations please refer to the workbook LR-K-101.No.ECR.Crosswalk.xls filed as part of the response to POIR No. 3 question 3d.

d. Witness Bradley's new analysis had no effect on PRC versions presented with the Postal Service's filing.

e. Please see the response to VP/USPS-T28-38e.

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF VALPAK, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-40.

Using PRC costing, in Docket No. R2001-1, the cost of Basic flats (non-automation, non-letters) in ECR was 10.017 cents and, in Docket No. R2005-1, it is 9.393 cents , constituting a decline of 6.23 percent. Mail processing costs declined 11.67 percent and delivery costs declined 3.11 percent. For Docket No. R2001-1 costs, see USPS-LR-J-83 (mail processing) and PRC-LR-7 (delivery). For Docket No. R2005-1 costs, see USPS-LR-K-107 (mail processing) and USPS-LR-K-101 (delivery).

a. Please confirm the numbers above. If any are incorrect, please make needed corrections, explain the corrections fully, supply corresponding proportionate changes, and answer the remainder of this question based on your corrections.

b. Please identify and discuss all factors accounting for the decline in mail processing costs, such as factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how it improves the estimation of marginal cost and volume variable costs.

c. Please identify and discuss all factors accounting for the decline in delivery costs, including factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how it improves the estimation of marginal cost and volume variable costs.

d. Please explain and quantify the effect of witness Bradley's new carrier analysis (USPS-T-14) on the delivery cost.

RESPONSE:

a. Confirmed for mail processing. Not confirmed for delivery. The percentage decline for ECR Basic flats is 2.82 percent.

b. Please see the response to VP/USPS-T28-38b.

c. Measured delivery cost can change for three reasons: changes in volume (including changes in mail mix), changes in operations that affect the way mail is

delivered or changes in the method of calculation. Changes in the first two will affect the accrued cost for delivery. Changes in the latter affect how much of the accrued delivery cost is attributed to each product. The Postal Service has not done an analysis of the change in accrued delivery cost and it is therefore not possible to break down the change in accrued cost to the many different reasons it occurred.

d. Witness Bradley's new analysis had no effect on PRC versions presented with the Postal Service's filing.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY

VP/USPS-T28-43. In the costs presented and discussed in interrogatories VP/USPS-T28-38 and 39, the cost of processing and delivering (i) ECR Basic letters is 13.125 cents and (ii) ECR Basic automation letters is 6.341 cents. The difference is 6.784 cents.

(a) Please discuss the extent to which you view the difference between these two categories as involving worksharing.
(b) Do you believe that the cost difference of 6.784 cents is an estimate of how much the Postal Service saves when a Basic letter becomes barcoded and shifts to the automation category? Please explain.
(c) Do you believe that, if a letter in the automation category were to have the barcode removed and shift back to the Basic letter category, the Postal Service would experience an increase in cost of 6.784 cents? Please explain.
(d) Please consider (i) an automation letter, and (ii) a Basic letter that is candidate for applying a barcode and thereby becoming machinable like an automation letter. Please discuss the differences in the way the two pieces would be handled and provide an estimate of the costs associated with these differences.

RESPONSE:

(a) Since the regulations for automation ECR letters require a mailer-applied delivery point barcode while the regulations for basic ECR letters do not, it is likely that the additional work done by mailers to apply delivery addresses and barcodes contributes to part of the cost difference between these two categories.

(b) If all basic ECR letters were automation compatible with a comparable level of addressing and not pre-barcoded, then the cost difference between basic ECR letters and automation ECR letters would solely be the result of automation ECR letters having a barcode. However, as explained in the response to POIR No. 3, Question 3(c), it is probable that a substantial portion of basic ECR letters are non-machinable or non-automation compatible. This is due to the Standard Mail Regular rate and ECR rate structures which encourage customers to prepare letter mail to qualify for automation rates rather than the basic ECR rates when possible. Hence, the cost difference likely reflects more than just the presence of a barcode on automation ECR letters. It reflects

the additional activities associated with the higher cost characteristics of basic ECR letters.

(c) No. As explained in part (b) above, the cost difference is almost certainly driven by more than just the presence of a barcode on automation ECR letters. As such, if an automation ECR letter were to have its barcode removed and its rate category reclassified as basic ECR, the resulting unit cost increase for this piece would likely be much less than 6.784 cents.

(d) Automation ECR letters are only eligible at CSBCS and manual zones. For the CSBCS zones, most of this mail will undergo DPS processing. For the manual zones, the pieces will be manually cased into route order by carriers.

For basic ECR letters (non-automation), pieces for DPS zones that are determined to be automation compatible may be captured in the plant for processing into delivery point sequence but could otherwise be dispatched directly to the delivery unit. At the delivery unit, basic ECR letters, *including those deposited directly into the delivery unit by* customers, would be evaluated for automation compatibility and may be sent back to the plant for delivery point sequencing. Those retained at the delivery unit would be distributed to carriers for manual casing into route order. Pieces for non-DPS zones would be dispatched directly to the delivery unit and would be manually cased by carriers into route order (note: basic ECR letters require a minimum of only ten pieces per route and are not intended to be taken directly to the street by carriers).

All delivery services cost differences (C/S 6, 7, and 10) between automation ECR and basic ECR letters are provided in USPS-LR-K-67 (Postal Service version) and USPS-LR-K-101 (PRC version). For pieces that are manually cased, because automation ECR pieces are claiming auto rates, there is a valid assumption that the address would more likely be complete, compared to basic ECR letters, which would result in lower carrier casing costs.

All mail processing cost differences (C/S 3.1) between automation ECR and basic ECR letters are provided in USPS-LR-K-84 (Postal Service version) and USPS-LR-K-107 (PRC version). Basic ECR letters that are not pre-barcoded that are selected for DPS processing must first be processed for the application of a Postal Service barcode. Automation ECR letters are pre-barcoded and can forgo this step. However, the mail processing cost pools are not set up in a way to measure the cost difference specifically associated with this additional step. Because each major type of letter automation equipment has a function in the barcoding process (image lift, address recognition and/or barcode application), barcoding work can occur in any of the letter automation cost pools in MODS facilities (OCR, BCS, and BCS/DBCS).

RESPONSES OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORIES OF VALPAK, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-45

Using USPS costing, from Docket No. R2001-1 to Docket No. R2005-1, at the nonworkshare-related cost of **Basic** and **3/5-digit non-automation** letters in the Standard Regular commercial category (used for the letter/flat differential and the presort discounts) increased 32.34 percent and 29.63 percent, respectively. The Docket No. R2005-1 cost of each, respectively, is 22.819 cents (17.409 mail processing plus 5.410 cents delivery) and 21.306 cents (15.022 mail processing plus 6.284 delivery). Mail processing and delivery costs are shown for both categories in USPS-LR-J-60 in Docket No. R2001-1, and in USPS-LR-K-48 in Docket No. R2005-1.

a. Focusing separately on the mail processing component, please identify and discuss all factors accounting for the increased cost, such as factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how well aligned it is with the concepts of marginal cost and volume variable costs.

b. Focusing separately on the delivery component, please identity and discuss all factors accounting for the increased cost, including factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement and in particular how well aligned it is with the concepts of marginal cost and volume variable costs.

Response

a. A possible reason for this increase may be related to the concerns described in the response of witness Abdirahman to POIR No.1, part a.

b. Measured delivery cost can change for three reasons: changes in volume (including changes in mail mix), changes in operations that affect the way mail is delivered or changes in the method of calculation. Changes in the first two will affect the accrued cost for delivery. Changes in the latter affect how much of the accrued delivery cost is attributed to each product. The Postal Service has not done an analysis of the change in accrued delivery cost and it is therefore not

possible to break down the change in accrued cost to the many different reasons it occurred. Changes in delivery costing methodology are explained in the testimonies of Witnesses Stevens, Kelley and Bradley, which discuss why the proposed new methods are an improvement over the established methodology. For a detailed analysis of the change in carrier methodology on cost for classes and subclasses please compare the USPS base year delivery cost (e.g, USPS-LR-K-3) with the base year costs calculated under the established methodology (USPS-LR-K-93). For a detailed comparison of the effect of new carrier methodology on rate categories please compare the unit costs in LR-K-67 with LR-K-101.

RESPONSE OF UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY

VP/USPS-T28-46.

Table 1, set out below, is taken from the first spreadsheet of file LR-K-48STDLETRS.xls of library reference USPS-LR-K-48, showing workshare-related costs for various categories of letter-size Standard Regular mail at USPS costing. A corresponding table in Docket No. R2001-1 is in USPS-LR-J-60, revised November 15, 2001. Table 2, set out below, shows the proportionate changes in costs from the corresponding table in Docket No. R2001-1 to those shown in Table 1.

For ease of reference, certain costs are shaded in each table. Please note that not all rows in the tables, including the indented rows, are for categories recognized in rates.

a. Please confirm that if the Postal Service were designing rates for Regular letters, based on current costs, and were following the procedures of Docket No. R2001-1, it is the costs in the shaded rows in Table 1 that would be used. If you do not confirm, please present alternative costs, provide their source, and respond to the following parts of this question based on your alternative costs.

b. Please refer to Table 2, column 3, and identify and discuss all factors accounting for the 97.586 percent increase in the worksharing-related delivery costs of nonautomation, nonmachinable letters at the mixed ADC, ADC, 3-digit, and 5-digit levels, such as factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how it improves the estimation of marginal cost and volume variable costs.

c. Please refer to Table 2, column 3, and identify and discuss all factors accounting for the increase of only 0.649 percent in the worksharing-related delivery costs of nonautomation, machinable letters at the mixed AADC and AADC levels, such as factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how it improves the estimation of marginal cost and volume variable costs.

d. In Docket No. R2001-1, the worksharing-related delivery costs were the same for nonautomation, machinable AADC letters and corresponding 3- and 5-digit letters. In Docket No. R2005-1, they are different, as shown in Table 1, column 3 — 3.879 cents for the first two and 3.682 cents for the last two.

(i) Please explain why these costs were the same before and now are different.

(ii) Are these Docket No. R2005-1 estimates considered to be marginal costs? If yes, please explain the assumptions necessary for them to be marginal costs. If no, please explain the costing theory behind the costs.

(iii) If these costs are marginal costs, are they based on different mixes? Is an assumption being made that any extra pieces on which a marginal cost is based have the same mix (possibly involving processing proportions) as the existing pieces in the category? Please explain the basis for any such assumption.

RESPONSE OF UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY

VP/USPS-T28-46 (continued):

e. Please refer to Table 2, column 2. The increase of 31.029 percent in the worksharing-related mail processing cost of nonautomation Basic presort letters is a weighted average of its components, shown immediately below to be 38.702 percent, 35.312 percent, 22.109 percent, and 22.109 percent. Please identify and discuss all factors accounting for the increases of these four components, such as factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how well aligned it is with the concepts of marginal cost and volume variable costs. Please also discuss the role of delivery point sequencing as regards the extent of the increase in cost.
f. Please refer to Table 2, column 2, last four rows. Despite inflation and increased delivery point sequencing, the worksharing-related mail processing costs of the four categories of automation letters (mixed AADC, AADC, 3-digit, and 5-digit) all decreased by, in the same order, 12.981 percent, 15.835 percent, 16.461 percent, and 20.623 percent. Please identify and discuss all factors accounting for these decreases, such as factor prices, changes in productivity, changes in technology, changes in the methods and procedures used in costing, changes in the way the mail is handled, and any other factors. For all changes in costing method or procedure identified, please explain why the change is an improvement, and in particular how well aligned it is with the concepts of marginal cost and volume variable costs. Please also discuss role of increased delivery point sequencing.

RESPONSE OF UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY

VP/USPS-T28-46 (continued):

Attachment to VP/USPS-T28-46
Table 1

Table 1. Cost Estimates

	Mail Processing		Delivery	Total
	Total Unit Cost	Worksharing Related Unit Cost	Worksharing Related Unit Cost	Worksharing Related Unit Cost
	(1)	(2)	(3)	(4)
RATE CATEGORY				
Nonauto Basic Presort Flats	23.148	n/a	9.290	32.438
Nonauto 3-Digit/5-Digit Presort Flats	14.528		9.290	23.818
Nonautomation Presort Letters	16.263	11.007	6.062	17.068
Nonautomation Basic Presort Letters	17.409	12.153	5.410	17.563
Nonautomation Nonmachinable Mixed ADC	37.485	32.229	11.049	43.278
Nonautomation Nonmachinable ADC	29.347	24.091	11.049	35.140
Nonautomation Machinable Mixed AADC	13.157	7.901	3.879	11.780
Nonautomation Machinable AADC	13.157	7.901	3.879	11.780
Nonautomation 3-Digit/5-Digit Presort Letters	15.022	10.614	6.284	16.899
Nonautomation Nonmachinable 3-Digit	26.409	21.153	11.049	32.202
Nonautomation Nonmachinable 5-Digit	17.812	12.556	11.049	23.605
Nonautomation Machinable 3-Digit	12.683	7.427	3.682	11.109
Nonautomation Machinable 5-Digit	12.683	7.427	3.682	11.109
Automation Mixed AADC Presort Letters	4.662	3.491	4.104	7.595
Automation AADC Presort Letters	3.943	2.772	3.890	6.662
Automation 3-Digit Presort Letters	3.691	2.519	3.794	6.313
Automation 5-Digit Presort Letters	2.817	1.646	3.538	5.184

Table 1. Cost Estimates

	Mail Processing		Delivery	Total
	Total Unit Cost	Worksharing Related Unit Cost	Worksharing Related Unit Cost	Worksharing Related Unit Cost
	(1)	(2)	(3)	(4)
RATE CATEGORY				
Nonauto Basic Presort Flats	23.148	n/a	9.290	32.438
Nonauto 3-Digit/5-Digit Presort Flats	14.528		9.290	23.818
Nonautomation Presort Letters	16.263	11.007	6.062	17.068
Nonautomation Basic Presort Letters	17.409	12.153	5.410	17.563
Nonautomation Nonmachinable Mixed ADC	37.485	32.229	11.049	43.278
Nonautomation Nonmachinable ADC	29.347	24.091	11.049	35.140
Nonautomation Machinable Mixed AADC	13.157	7.901	3.879	11.780
Nonautomation Machinable AADC	13.157	7.901	3.879	11.780
Nonautomation 3-Digit/5-Digit Presort Letters	15.022	10.614	6.284	16.899
Nonautomation Nonmachinable 3-Digit	26.409	21.153	11.049	32.202
Nonautomation Nonmachinable 5-Digit	17.812	12.556	11.049	23.605
Nonautomation Machinable 3-Digit	12.683	7.427	3.682	11.109
Nonautomation Machinable 5-Digit	12.683	7.427	3.682	11.109
Automation Mixed AADC Presort Letters	4.662	3.491	4.104	7.595
Automation AADC Presort Letters	3.943	2.772	3.890	6.662
Automation 3-Digit Presort Letters	3.691	2.519	3.794	6.313
Automation 5-Digit Presort Letters	2.817	1.646	3.538	5.184

RESPONSE OF UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY

VP/USPS-T28-46 (continued):

Attachment to VP/USPS-T28-46
Table 2

Table 2. Percentage Changes from Docket No. R2001-1

	Mail Processing		Delivery	Total
		Worksharing	Worksharing	Worksharing
	Total Unit Cost	Related Unit Cost	Related Unit Cost	Related Unit Cost
	(1)	(2)	(3)	(4)
RATE CATEGORY				
Nonauto Basic Presort Flats				
Nonauto 3-Digit/5-Digit Presort Flats				
Nonautomation Presort Letters				
Nonautomation Basic Presort Letters	33.531%	31.029%	28.615%	30.275%
Nonautomation Nonmachinable Mixed ADC	38.841%	38.702%	97.586%	50.124%
Nonautomation Nonmachinable ADC	36.077%	35.312%	97.586%	50.196%
Nonautomation Machinable Mixed AADC	28.577%	22.109%	0.649%	14.098%
Nonautomation Machinable AADC	28.577%	22.109%	0.649%	14.098%
Nonautomation 3-Digit/5-Digit Presort Letters	23.658%	26.571%	42.291%	31.994%
Nonautomation Nonmachinable 3-Digit	35.507%	34.504%	97.586%	51.050%
Nonautomation Nonmachinable 5-Digit	26.368%	21.513%	97.586%	48.226%
Nonautomation Machinable 3-Digit	28.447%	21.519%	-2.926%	12.157%
Nonautomation Machinable 5-Digit	28.447%	21.519%	-2.926%	12.157%
Automation Mixed AADC Presort Letters	-7.575%	-12.981%	5.583%	-3.846%
Automation AADC Presort Letters	-8.850%	-15.835%	1.646%	-6.440%
Automation 3-Digit Presort Letters	-8.837%	-16.461%	-0.472%	-7.534%
Automation 5-Digit Presort Letters	-9.303%	-20.623%	-5.350%	-10.800%

RESPONSE OF UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY

RESPONSE to VP/USPS-T28-46:

a. See the June 14, 2005, response of witness Taufique.

b. The revised Table 2 percentages in the Table below reflect the revised USPS-LR-K-48. Using USPS-LR-K-67 and USPS-LR-J-117 as sources, the percentage increase in unit delivery costs is 31.42 percent (11.050 cents in R2005-1 and 8.408 in R2001-1), rather than 97.59 percent proposed in the question Measured delivery cost can change for three reasons: changes in volume (including changes in mail mix), changes in operations that affect the way mail is delivered or changes in the method of calculation. Changes in the first two will affect the accrued cost for delivery. Changes in the latter affect how much of the accrued delivery cost is attributed to each product. The Postal Service has not done an analysis of the change in accrued delivery cost and it is therefore not possible to break down the change in accrued cost to the many different reasons it occurred. Changes in delivery costing methodology are explained in the testimonies of Witnesses Stevens, Kelley and Bradley, which discuss why the proposed new methods are an improvement over the established methodology. For a detailed analysis of the change in carrier methodology on cost for classes and subclasses please compare the USPS base year delivery cost with the base year costs calculated under the PRC methodology. For a detailed comparison of the effect of new carrier methodology on rate categories please compare the unit costs in LR-K-67 with LR-K-101.

**RESPONSE OF UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY**

RESPONSE to VP/USPS-T28-46 (continued):

c. Measured delivery cost can change for three reasons: changes in volume (including changes in mail mix), changes in operations that affect the way mail is delivered or changes in the method of calculation. Changes in the first two will affect the accrued cost for delivery. Changes in the latter affect how much of the accrued delivery cost is attributed to each product. The Postal Service has not done an analysis of the change in accrued delivery cost and it is therefore not possible to break down the change in accrued cost to the many different reasons it occurred. Changes in delivery costing methodology are explained in the testimonies of Witnesses Stevens, Kelly and Bradley, which discuss why the proposed new methods are an improvement over the established methodology. For a detailed analysis of the change in carrier methodology on cost for classes and subclasses please compare the USPS base year delivery cost with the base year costs calculated under the PRC methodology. For a detailed comparison of the effect of new carrier methodology on rate categories please compare the unit costs in LR-K-67 with LR-K-101.

d. (i) In Docket No. R2001-1, the workshare related delivery costs were not the same for nonautomation machinable Mixed AADC, AADC mail and nonautomation machinable 3-digit and 5-digit. Please refer to USPS-LR-J-60, page 56, column 3, where the costs shown for the first two categories are 3.854 cents, and for the last two, 3.793 cents. The reason that the current USPS unit delivery costs are different is that the DPS

RESPONSE OF UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY

RESPONSE to VP/USPS-T28-46 (continued):

percentage is higher for Standard presort nonautomation machinable 3/5 digit letters (84.40%) as compared to Standard Basic nonautomation, machinable AADC letters (82.02%).

(ii). Yes. Please see USPS-LR-K-1 (Summary Description) for a discussion of the methodology and assumptions underlying the calculation of volume variable and marginal cost.

(iii). The Postal Service measures the marginal costs of products in the base year, which reflect the actual mix of products provided at that time.

e. Please see the Postal Service's response to VP/USPS-T28-45.a.

f. Please see witness Smith's response to VP/USPS-T28-44.b

RESPONSE OF UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY

RESPONSE to VP/USPS-T28-46 (continued):

Attachment to response to VP/USPS-T28-46b

Table 2. Percentage Changes from Docket No. R2001-1

	Mail Processing		Delivery	Total
	Total Unit Cost (1)	Worksharing Related Unit Cost (2)	Worksharing Related Unit Cost (3)	Worksharing Related Unit Cost (4)
RATE CATEGORY				
Nonauto Basic Presort Flats				
Nonauto 3-Digit/5-Digit Presort Flats				
Nonautomation Presort Letters				
Nonautomation Basic Presort Letters	33.518%	32.823%	28.615%	31.510%
Nonautomation Nonmachinable Mixed ADC	38.957%	39.560%	97.586%	50.816%
Nonautomation Nonmachinable ADC	36.196%	36.400%	97.586%	51.024%
Nonautomation Machinable Mixed AADC	28.481%	24.556%	0.649%	15.631%
Nonautomation Machinable AADC	28.481%	24.556%	0.649%	15.631%
Nonautomation 3-Digit/5-Digit Presort Letters	23.718%	28.583%	42.291%	33.312%
Nonautomation Nonmachinable 3-Digit	35.628%	35.723%	97.586%	51.950%
Nonautomation Nonmachinable 5-Digit	26.493%	23.312%	97.586%	49.393%
Nonautomation Machinable 3-Digit	28.343%	24.104%	-2.926%	13.752%
Nonautomation Machinable 5-Digit	28.343%	24.104%	-2.926%	13.752%
Automation Mixed AADC Presort Letters	-7.625%	-12.624%	5.583%	-3.665%
Automation AADC Presort Letters	-8.876%	-15.357%	1.646%	-6.219%
Automation 3-Digit Presort Letters	-8.852%	-15.922%	-0.472%	-7.296%
Automation 5-Digit Presort Letters	-9.266%	-19.754%	-5.350%	-10.490%

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-48. In presort-tree form, Chart Nos. 1 and 2 attached show costs (cents per piece), workshare-related and not, as appropriate, for Standard Regular (above the uneven line) and Standard ECR (below the uneven line) mail. Chart No. 1 is for the commercial category, and Chart No. 2 is for the nonprofit category. Both charts show USPS costs from Docket No. R2001-1, upon which the current rates are based, which in turn would be elevated by the Postal Service's across-the-board proposal in the instant docket, thus perpetuating relative rate levels.

The columns on each chart are labeled. Boxes with **one** layer set out either total or workshare-related costs, as appropriate. Boxes with **two** layers set out total costs on the top layer and workshare-related costs on the bottom layer. Boxes with **three** layers set out a cost difference in the top layer, a percentage passthrough in the middle layer, and a rounded discount in the bottom layer. The arrows show the sources of the cost differences.

a. With respect to the columns labeled (i) barcode letter, (ii) letter, (iii) flat, and (iv) barcode flat, please confirm that the cost shown in each single-layer box is correct. If any are incorrect, please provide the correct cost and a reference to its source.

b. With respect to the columns labeled (i) letter and (ii) flat, please confirm that the unit cost in each of the double-layer boxes is correct. If any are incorrect, please provide the correct cost and a reference to its source.

RESPONSE:

(a)-(b) Please see the attached charts, which have also been filed in Excel format.

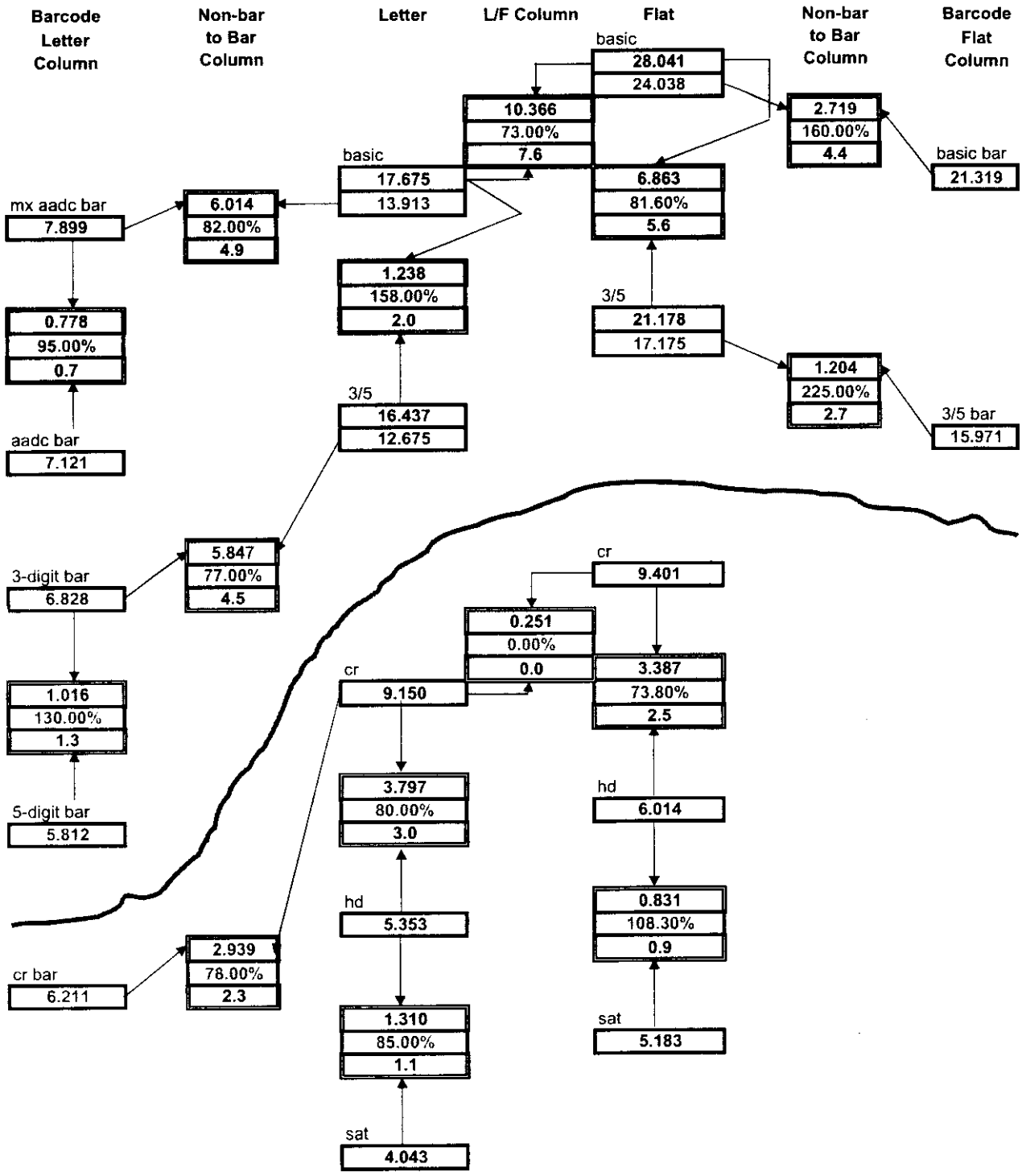
Note the following:

- The mail processing and delivery unit cost values on rows 12-15 of the input table for Chart 1 (sheet 9 on the Excel file) have been changed to reflect the revised estimates in USPS-LR-J-60 as submitted on 11/15/01. Also, the source descriptions on rows 30-31 have been changed from USPS-LR-J-131 to USPS-LR-J-132.
- The delivery unit cost values of rows 9, 16-18, and 25-27 of the input table for Chart 2 (sheet 10 on the Excel file) have been changed to reflect the revised estimated in USPS-LR-J-131 as submitted on 1/3/02.
- Spreadsheet formulas have been added to link the cost values on the input sheets (sheets 9 and 10 on the Excel file) to the costs values on the presort tree sheets (sheets 1 and 2 on the Excel file). Accordingly, some of the cost values in the presort

tree sheets have changed from those values originally submitted. The formulas within the presort trees used to calculate cost differentials have not been checked or confirmed, nor have the passthrough percentages.

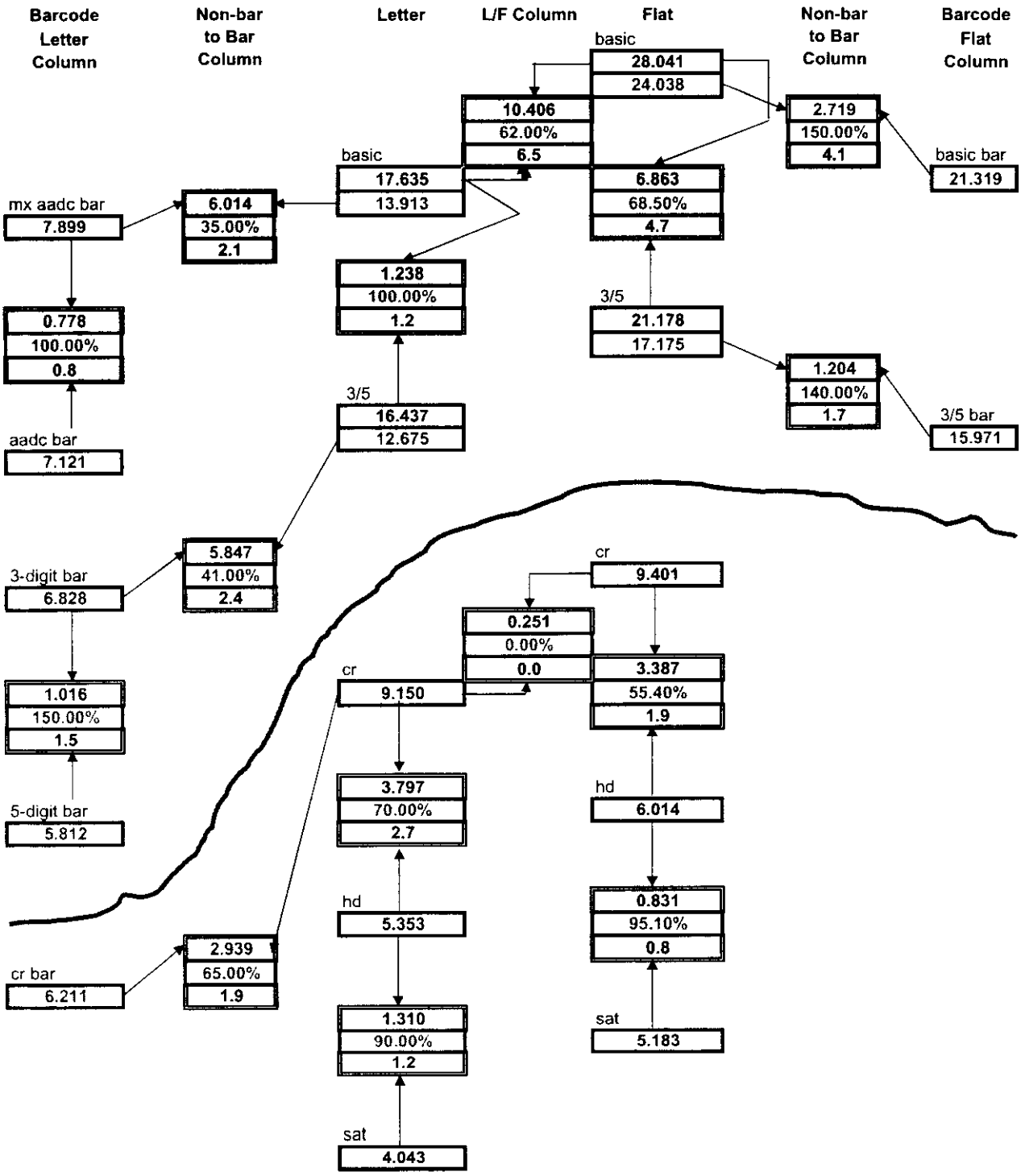
RESPONSE OF THE UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

Commercial Standard, USPS Costs, Docket No. R2001-1



RESPONSE OF THE UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

Nonprofit Standard, USPS Costs, Docket No. R2001-1



RESPONSE OF THE UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

Sources for figures in Chart 1 of Attachment to VP/USPS-T28-48

Figure Column 1	Component Mail Processing	Source	Component Delivery	Source
7.899	4.012	USPS-LR-J-132-WP1.xls sheet 'COST'	3.887	USPS-LR-J-132-WP1.xls sheet 'COST'
7.121	3.294		3.827	
6.828	3.016		3.812	
5.812	2.074		3.738	
6.211	1.615	USPS-LR-J-131-WP1.xls sheet 'COST', revised 1/3/02	4.596	USPS-LR-J-131-WP1.xls sheet 'COST', revised 1/3/02
Column 5				
17.675	13.474	USPS-LR-J-60, revised 11/15/01, file STDREV.xls sheet 'SAVINGS'	4.201	USPS-LR-J-60, revised 11/15/01, file STDREV.xls sheet 'SAVINGS'
13.913	9.712	USPS-LR-J-60, revised 11/15/01, file STDREV.xls sheet 'LETTERS SUMMARY'	4.201	USPS-LR-J-60, revised 11/15/01, file STDREV.xls sheet 'LETTERS SUMMARY'
16.437	12.019	USPS-LR-J-60, revised 11/15/01, file STDREV.xls sheet 'SAVINGS'	4.418	USPS-LR-J-60, revised 11/15/01, file STDREV.xls sheet 'SAVINGS'
12.675	8.257	USPS-LR-J-60, revised 11/15/01, file STDREV.xls sheet 'LETTERS SUMMARY'	4.418	USPS-LR-J-60, revised 11/15/01, file STDREV.xls sheet 'LETTERS SUMMARY'
9.150	2.766	USPS-LR-J-131-WP1.xls sheet 'COST', revised 1/3/02	6.384	USPS-LR-J-131-WP1.xls sheet 'COST', revised 1/3/02
5.353	0.669		4.684	
4.043	0.669		3.374	
Column 7				
28.041	19.729	USPS-LR-J-132-WP1.xls sheet 'COST'	8.312	USPS-LR-J-132-WP1.xls sheet 'COST'
24.038	15.726		8.312	
21.178	12.866		8.312	
17.175	8.863		8.312	
9.401	3.331	USPS-LR-J-131-WP1.xls sheet 'COST', revised 1/3/02	6.070	USPS-LR-J-131-WP1.xls sheet 'COST', revised 1/3/02
6.014	1.152		4.862	
5.183	1.152		4.031	
Column 11				
21.319	13.007	USPS-LR-J-132-WP1.xls sheet 'COST'	8.312	USPS-LR-J-132-WP1.xls sheet 'COST'
15.971	7.659		8.312	

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

Sources for figures in Chart 2 of Attachment to VP/USPS-T28-48

Figure Column 1	Component Mail Processing	Source	Component Delivery	Source
7.899	4.012	USPS-LR-J-132-WP2.xls sheet 'NCOST'	3.887	USPS-LR-J-132-WP2.xls sheet 'NCOST'
7.121	3.294		3.827	
6.828	3.016		3.812	
5.812	2.074		3.738	
6.211	1.615	USPS-LR-J-131-WP2 sheet 'NCOST', revised 1/3/02	4.596	USPS-LR-J-131-WP2 sheet 'NCOST', revised 1/3/02
Column 5				
17.635	13.434	USPS-LR-J-132-WP2.xls sheet 'NCOST'	4.201	USPS-LR-J-132-WP2.xls sheet 'NCOST'
13.913	9.712		4.201	
16.437	12.019		4.418	
12.675	8.257		4.418	
9.150	2.766	USPS-LR-J-131-WP2 sheet 'NCOST', revised 1/3/02	6.384	USPS-LR-J-131-WP2 sheet 'NCOST', revised 1/3/02
5.353	0.669		4.684	
4.043	0.669		3.374	
Column 7				
28.041	19.729	USPS-LR-J-132-WP2.xls sheet 'NCOST'	8.312	USPS-LR-J-132-WP2.xls sheet 'NCOST'
24.038	15.726		8.312	
21.178	12.866		8.312	
17.175	8.863		8.312	
9.401	3.331	USPS-LR-J-131-WP2 sheet 'NCOST', revised 1/3/02	6.070	USPS-LR-J-131-WP2 sheet 'NCOST', revised 1/3/02
6.014	1.152		4.862	
5.183	1.152		4.031	
Column 11				
21.319	13.007	USPS-LR-J-132-WP2.xls sheet 'NCOST'	8.312	USPS-LR-J-132-WP2.xls sheet 'NCOST'
15.971	7.659		8.312	

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK,
REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-49. In presort-tree form, Chart Nos. 1 and 2 attached show costs (cents per piece), workshare-related and not, as appropriate, for Standard Regular (above the uneven line) and Standard ECR (below the uneven line) mail. Chart No. 1 is for the commercial category, and Chart No. 2 is for the nonprofit category. Both charts show PRC costs from library references in Docket No. R2005-1.

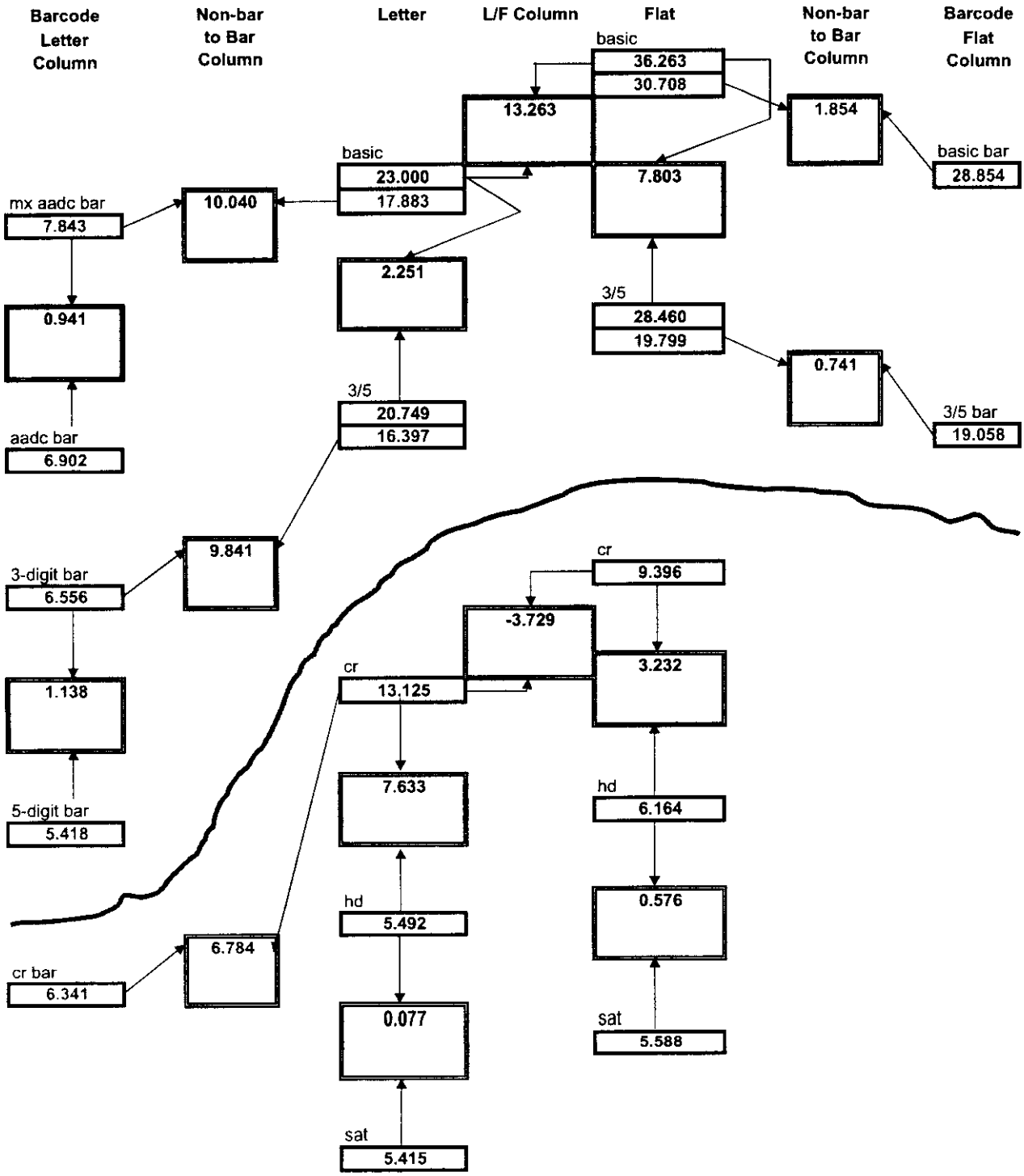
The columns on each chart are labeled. Boxes with **one** layer set out either total or workshare-related costs, as appropriate. Boxes with **two** layers set out total costs on the top layer and workshare-related costs on the bottom layer. The largest boxes with **three** possible layers set out a cost difference in the top layer, with the second two layers empty. The arrows show the sources of the cost differences.

(a) With respect to the columns labeled (i) barcode letter, (ii) letter, (iii) flat, and (iv) barcode flat, please confirm that the cost shown in each single-layer box is correct. If any are incorrect, please provide the correct cost and a reference to its source.

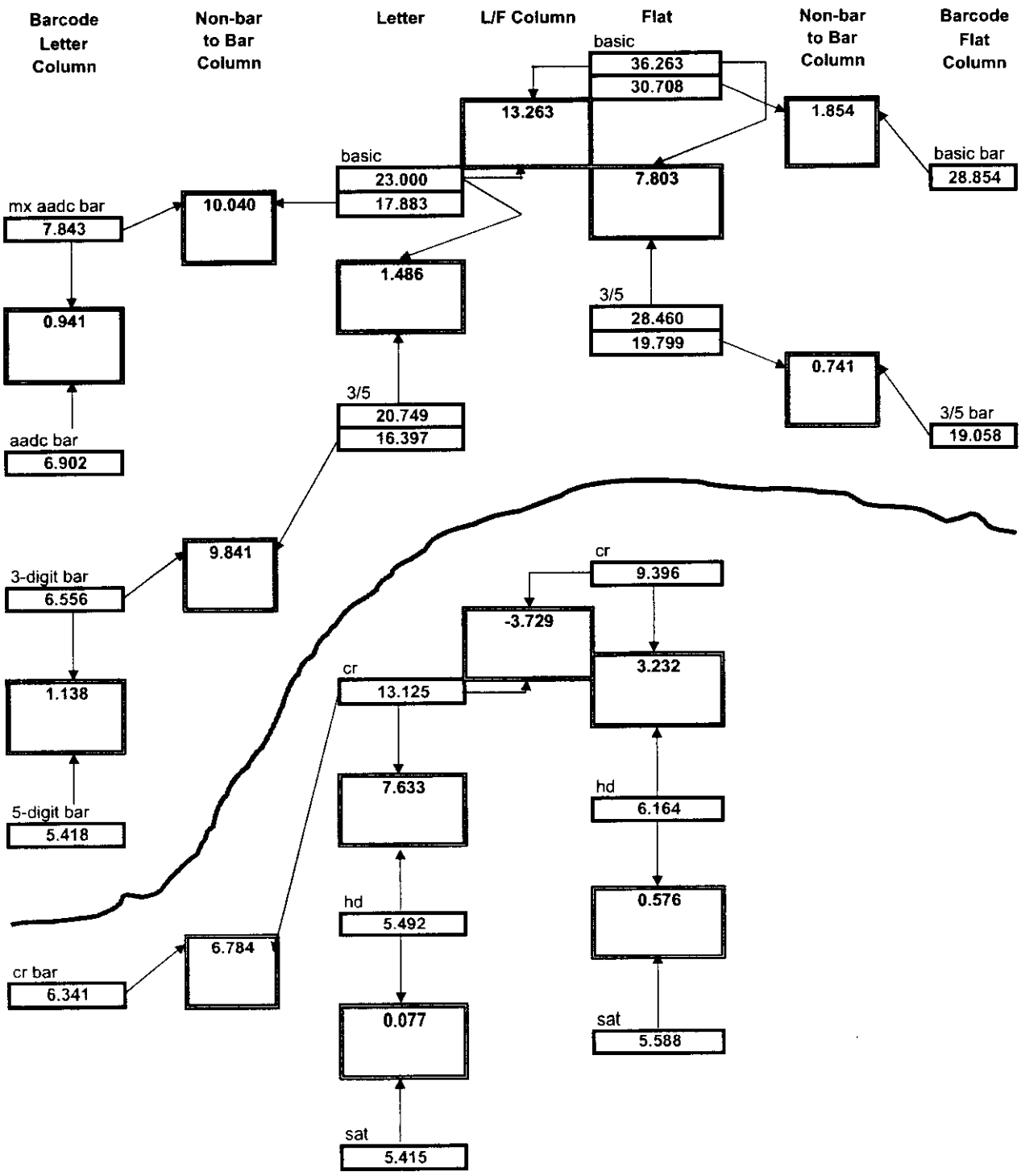
(b) With respect to the columns labeled (i) letter and (ii) flat, please confirm that the unit cost in each of the double-layer boxes is correct. If any are incorrect, please provide the correct cost and a reference to its source.

ATTACHMENT TO VALPAK INTERROGATORY

Commercial Standard, PRC Costs, Docket No. R2005-1



Nonprofit Standard, PRC Costs, Docket No. R2005-1



ATTACHMENT TO VALPAK INTERROGATORY

Sources for figures in Charts 1 and 2 of Attachment to VP/USPS-T28-49

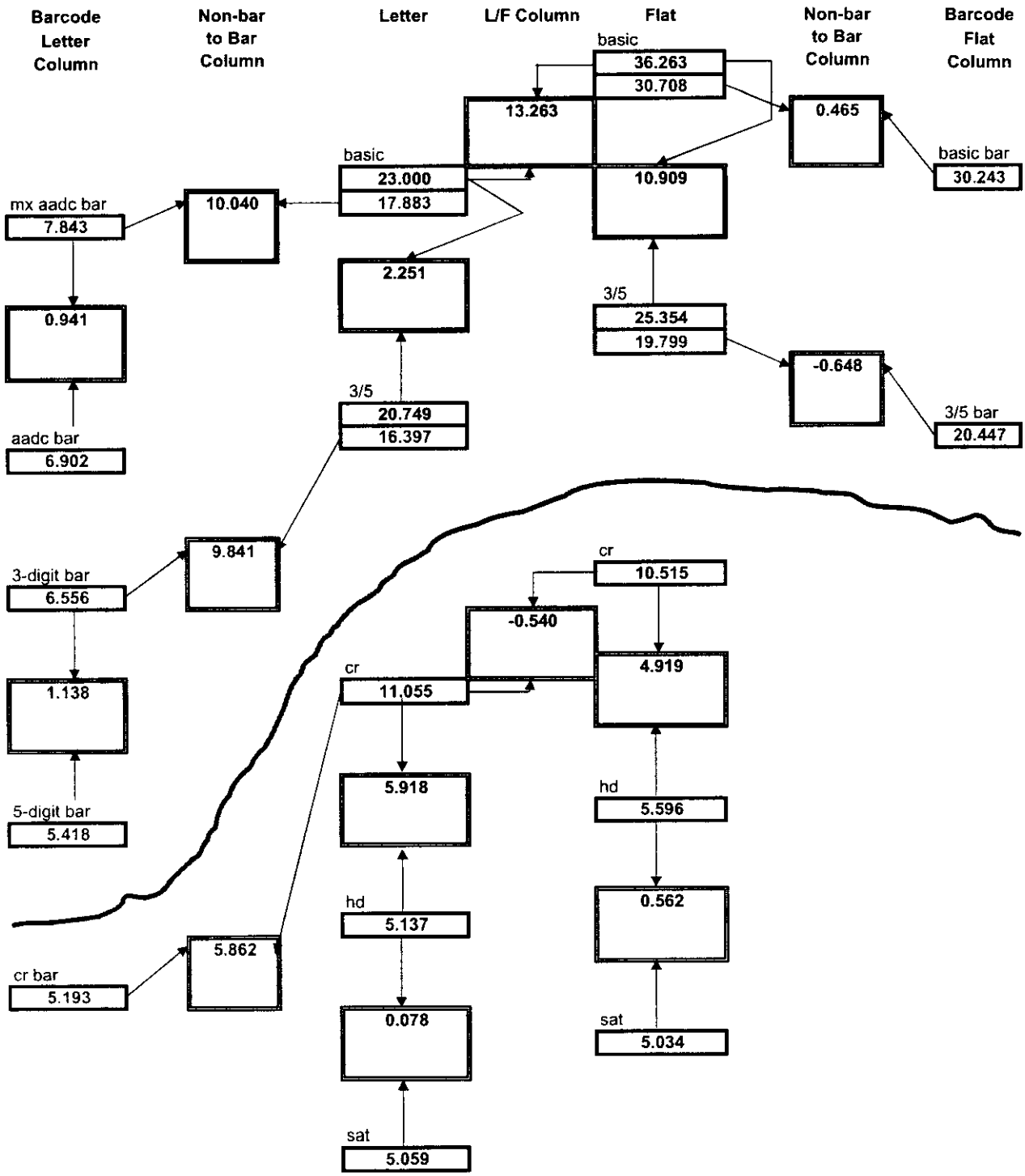
Figure Column 1	Component Mail Processing	Source	Component Delivery	Source
7.843	4.022	LR-K-110STDLTRS.xls, sheet 'Letter Sum' as modified in response to Question 3 of POIR No. 3.	3.821	LR-K-110STDLTRS.xls, sheet 'Letter Sum'
6.902	3.165		3.737	
6.556	2.857		3.699	
5.418	1.819		3.599	
6.341	1.523	LR-K-107.xls, sheet 'CompTab'	4.818	LR-K-101.xls, sheet 'Table 1'
Column 5				
23.000	18.665	LR-K-110STDLTRS.xls, sheet 'Letter Sum' as modified in response to Question 3 of POIR No. 3.	4.335	LR-K-110STDLTRS.xls, sheet 'Letter Sum'
17.883	13.548		4.335	
20.749	16.071		4.678	
16.397	11.719		4.678	
13.125	3.431	LR-K-107.xls, sheet 'CompTab'	9.694	LR-K-101, sheet 'Table 1'
5.492	1.056		4.436	
5.415	1.056		4.359	
Column 7				
36.263	26.468	LR-K-102, file STANDARD FLATS PRC.xls, sheets 'CRA ADJ UNIT COSTS' AND 'PRESORT LEVELS HELD CONSTANT' as modified in response to Question 3 of POIR No. 3	9.795	LR-K-101.xls sheet 'Table 1' as modified in response to Question 3 of POIR No. 3
30.708	20.913		9.795	
28.460	18.665		9.795	
19.799	10.004		9.795	
9.396	3.223	LR-K-107.xls, sheet 'CompTab'	6.173	
6.164	1.480		4.684	
5.588	1.480		4.108	
Column 11				
28.854	19.059	LR-K-102, file STANDARD FLATS PRC.xls, sheet 'PRESORT LEVELS HELD CONSTANT'	9.795	LR-K-101.xls, sheet 'Table 1'
19.058	9.263		9.795	

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK,
REDIRECTED FROM WITNESS TAUFIQUE

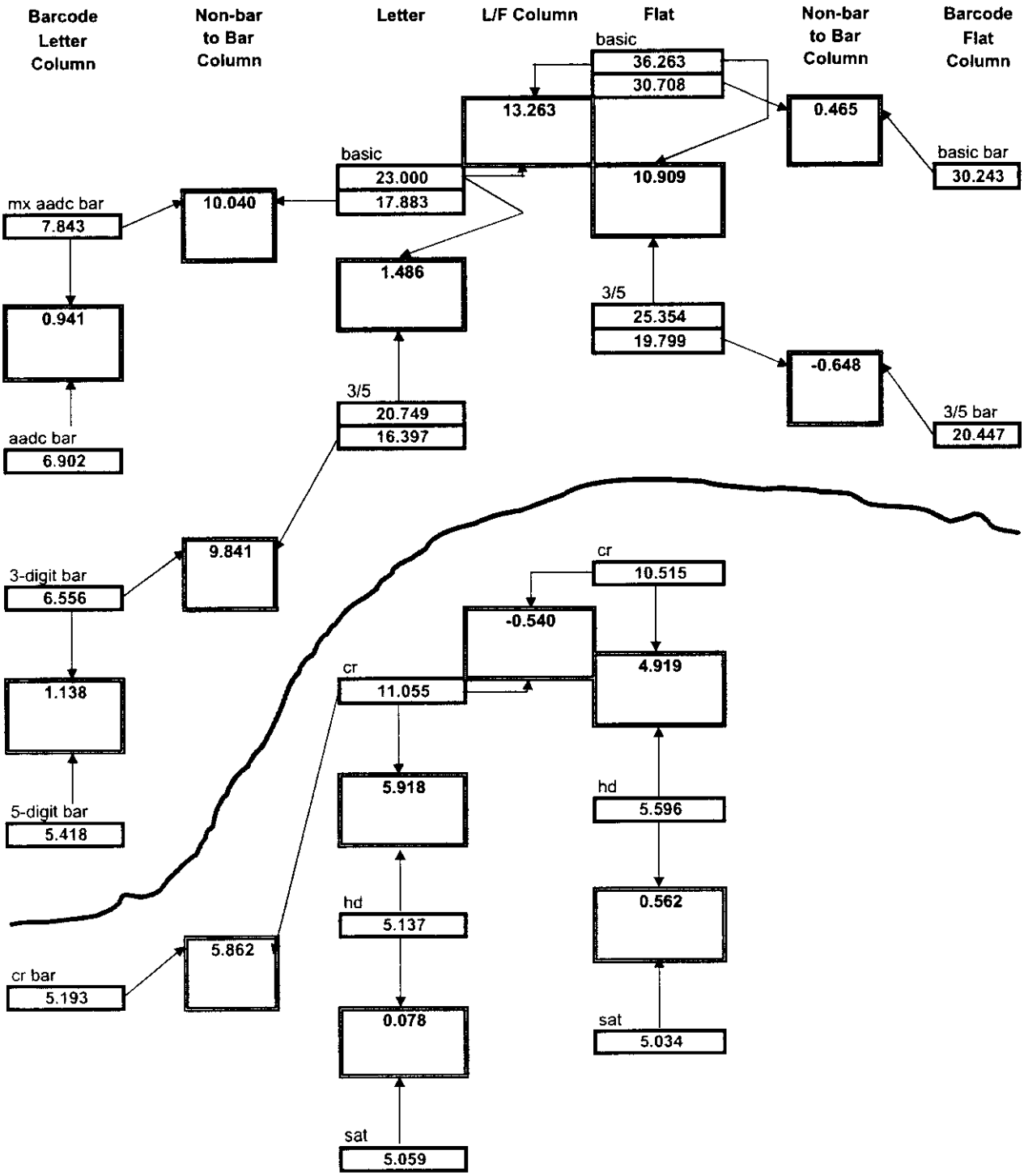
RESPONSE TO INTERROGATORY 49:

(a)-(b) Please see the following charts, which are also on the attached Excel spreadsheet.

Commercial Standard, PRC Costs, Docket No. R2005-1



Nonprofit Standard, PRC Costs, Docket No. R2005-1

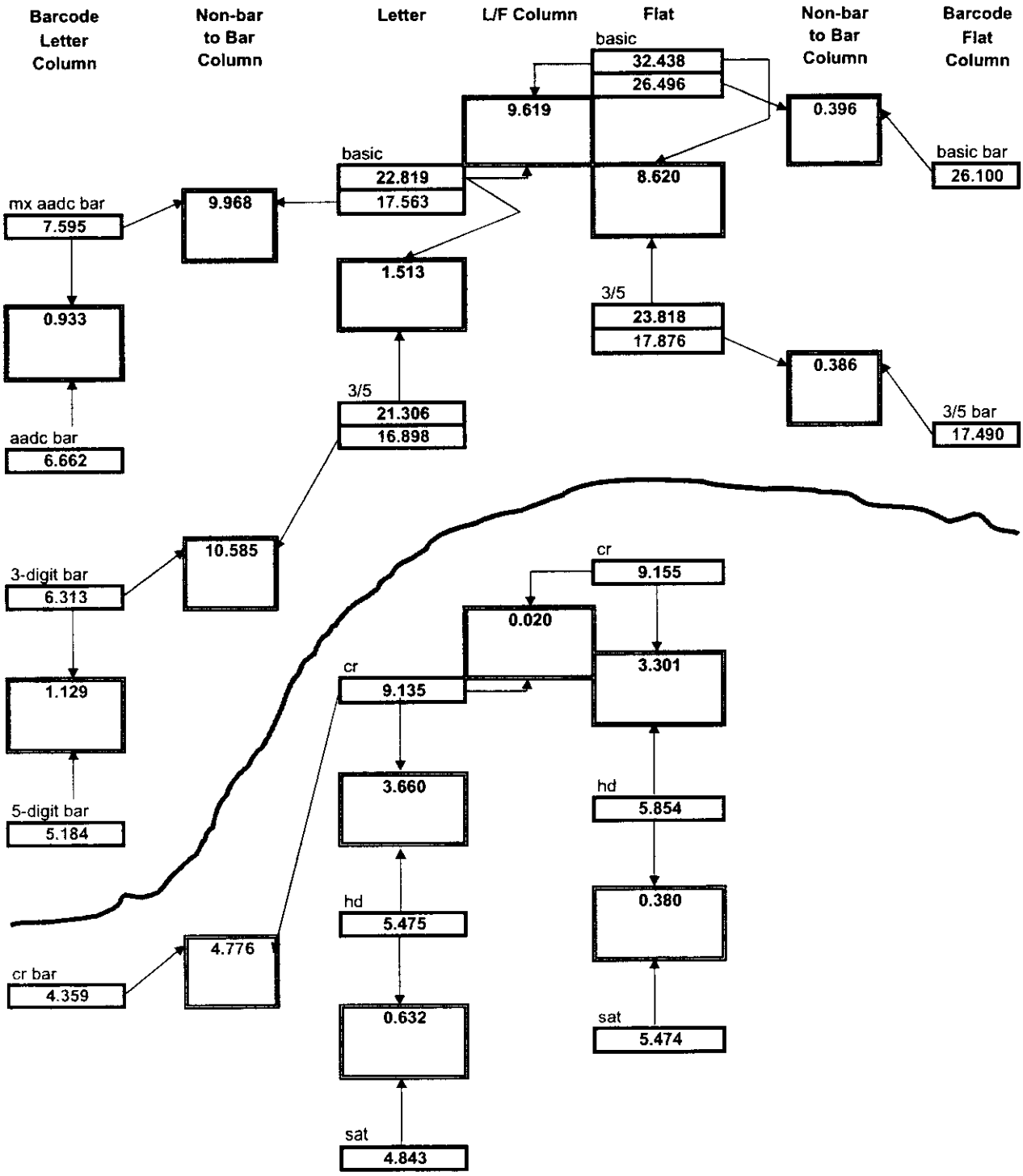


Sources for figures in Charts 1 and 2 of Attachment to VP/USPS-T28-49

Figure Column 1	Component Mail Processing	Source	Component Delivery	Source
7.843	4.022	LR-K-110STDLTRS.xls, sheet 'Letter Sum' as modified in response to Question 3 of POIR No. 3.	3.821	LR-K-110STDLTRS.xls, sheet 'Letter Sum'
6.902	3.165		3.737	
6.556	2.857		3.699	
5.418	1.819		3.599	
5.193	1.523	LR-K-107.xls, sheet 'CompTab'	3.670	LR-K-101_Revised.xls, sheet 'Table 1'
Column 5				
23.000	18.665	LR-K-110STDLTRS.xls, sheet 'Letter Sum' as modified in response to Question 3 of POIR No. 3.	4.335	LR-K-110STDLTRS.xls, sheet 'Letter Sum'
17.883	13.548		4.335	
20.749	16.071		4.678	
16.397	11.719		4.678	
11.055	3.431	LR-K-107.xls, sheet 'CompTab'	7.624	LR-K-101_Revised.xls, sheet 'Table 1'
5.137	1.056		4.081	
5.059	1.056		4.003	
Column 7				
36.263	26.468	LR-K-102, file STANDARD FLATS PRC.xls, sheets 'CRA ADJ UNIT COSTS' AND 'PRESORT LEVELS HELD CONSTANT' as modified in response to Question 3 of POIR No. 3	9.795	LR-K-101_Revised.xls sheet 'Table 1' as modified in response to Question 3 of POIR No. 3
30.708	20.913		9.795	
25.354	15.559		9.795	
19.799	10.004		9.795	
10.515	3.223	LR-K-107.xls, sheet 'CompTab'	7.292	
5.596	1.480		4.116	
5.034	1.480		3.554	
Column 11				
30.243	19.059	LR-K-102, file STANDARD FLATS PRC.xls, sheet 'PRESORT LEVELS HELD CONSTANT'	11.184	LR-K-101_Revised.xls sheet 'Table 1'
20.447	9.263		11.184	

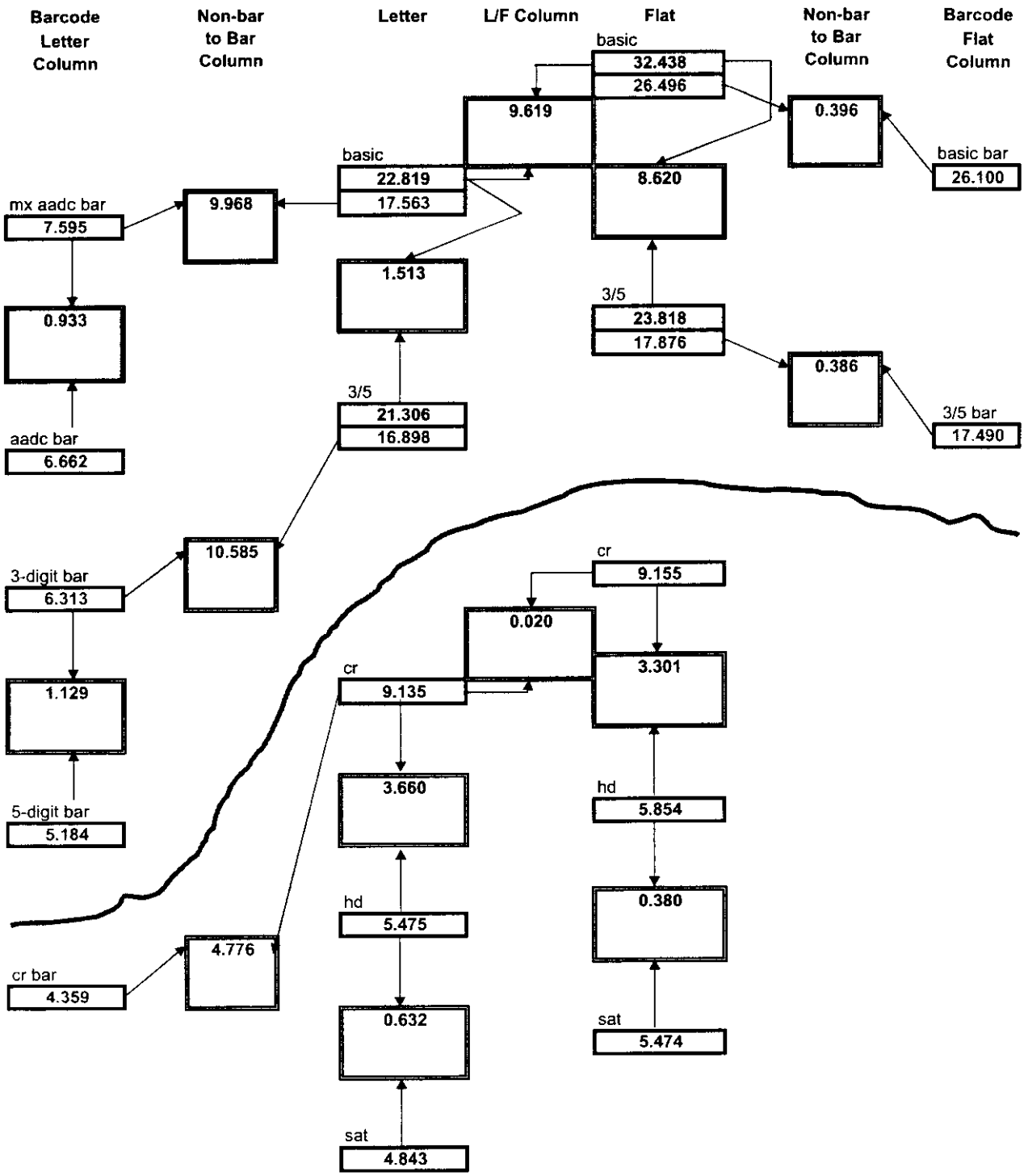
ATTACHMENT TO VALPAK INTERROGATORY

Commercial Standard, USPS Costs, Docket No. R2005-1



ATTACHMENT TO VALPAK INTERROGATORY

Nonprofit Standard, USPS Costs, Docket No. R2005-1



ATTACHMENT TO VALPAK INTERROGATORY

Sources for figures in Charts 1 and 2 of Attachment to VP/USPS-T28-50

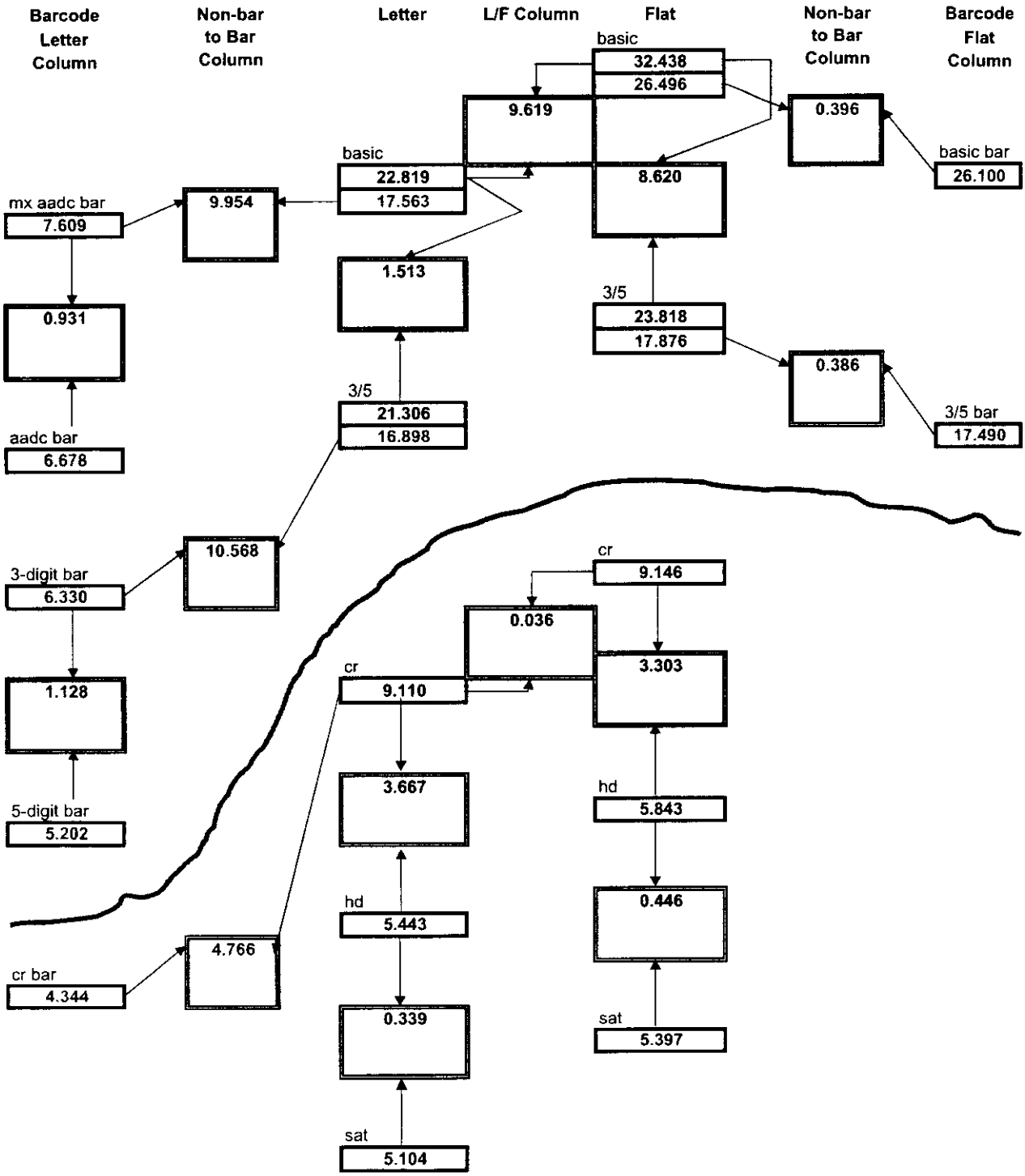
Figure Column 1	Component Mail Processing	Source	Component Delivery	Source
7.609	3.505	LR-K-48STDLETRS.xls sheet 'Letter Sum'	4.104	LR-K-48STDLETRS.xls sheet 'Letter Sum'
6.678	2.788		3.890	
6.330	2.536		3.794	
5.202	1.664		3.538	
4.344	1.457	LR-K-84.xls sheet 'Test Tab'	2.887	LR-K-67_Revised.xls sheet '1.Table 1'
Column 5				
22.817	17.407	LR-K-48STDLETRS.xls sheet 'Letter Sum'	5.410	LR-K-48STDLETRS.xls sheet 'Letter Sum'
17.730	12.320		5.410	
21.314	15.030		6.284	
17.067	10.783		6.284	
9.110	3.776	LR-K-84.xls sheet 'Test Tab'	5.334	LR-K-67_Revised.xls sheet '1.Table 1'
5.443	0.967		4.476	
5.104	0.967		4.137	
Column 7				
32.438	23.148	LR-K-43, file STANDARD FLATS.xls, sheet 'CRA ADJ UNIT COSTS'	9.290	LR-K-67_Revised.xls sheet '1.Table 1'
26.496	17.206		9.290	
23.818	14.528		9.290	
17.876	8.586		9.290	
9.146	3.003	LR-K-84.xls sheet 'Test Tab'	6.143	
5.843	1.234		4.609	
5.397	1.234		4.163	
Column 11				
26.100	16.810	LR-K-43, file STANDARD FLATS.xls, sheet 'CRA ADJ UNIT COSTS'	9.290	LR-K-67_Revised.xls sheet '1.Table 1'
17.490	8.200		9.290	

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK,
REDIRECTED FROM WITNESS TAUFIQUE

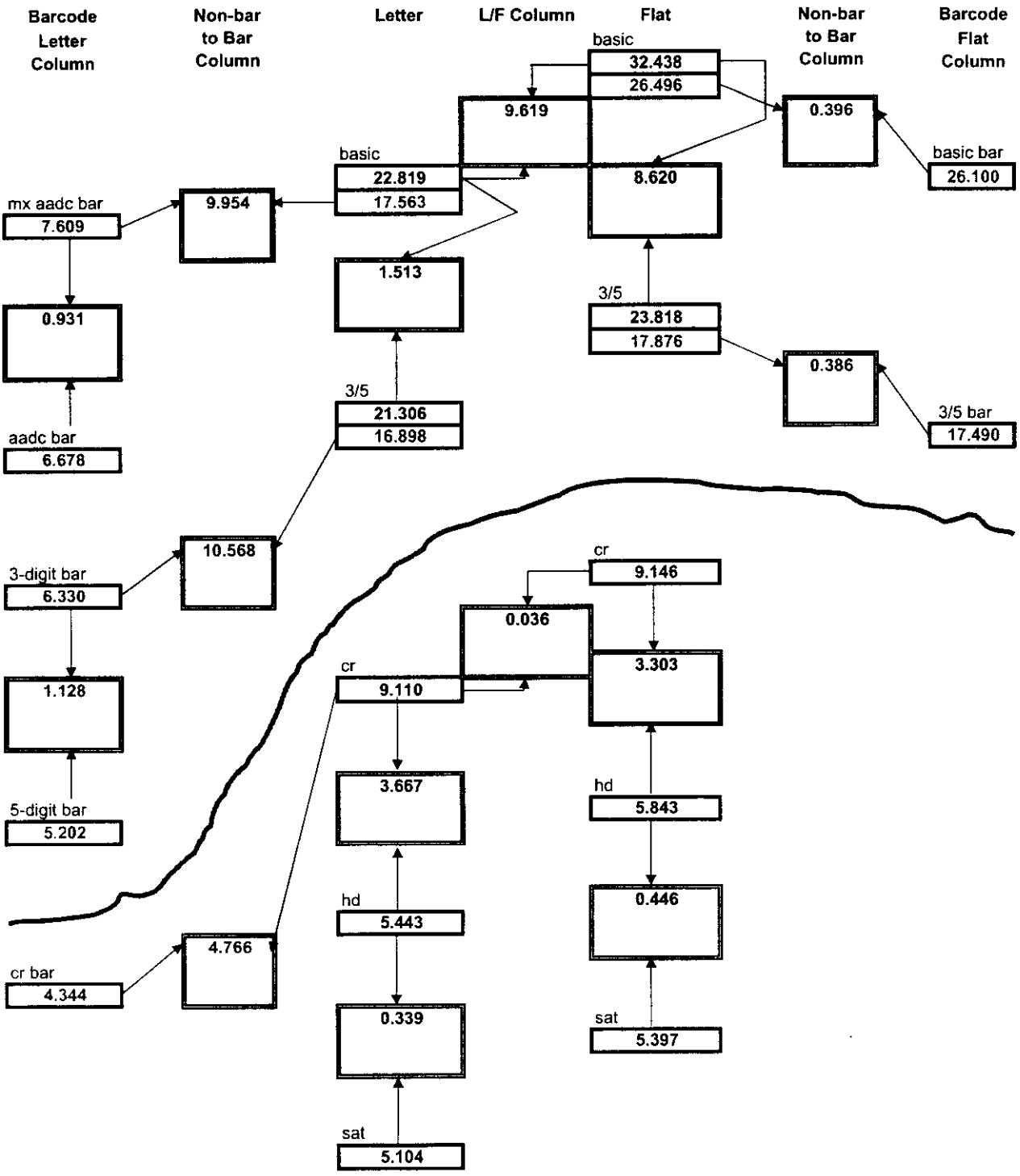
RESPONSE TO INTERROGATORY 50:

(a)-(b) Please see the following charts, which are also on the attached Excel spreadsheet.

Commercial Standard, USPS Costs, Docket No. R2005-1



Nonprofit Standard, USPS Costs, Docket No. R2005-1



Sources for figures in Charts 1 and 2 of Attachment to VP/USPS-T28-50

Figure Column 1	Component Mail Processing	Source	Component Delivery	Source
7.609	3.505	LR-K-48STDLETRS.xls sheet 'Letter Sum'	4.104	LR-K-48STDLETRS.xls sheet 'Letter Sum'
6.678	2.788		3.890	
6.330	2.536		3.794	
5.202	1.664		3.538	
4.344	1.457	LR-K-84.xls sheet 'Test Tab'	2.887	LR-K-67_2nd.revised.xls sheet '1.Table
Column 5				
22.819	17.409	LR-K-48STDLETRS.xls sheet 'Letter Sum'	5.410	LR-K-48STDLETRS.xls sheet 'Letter Sum'
17.563	12.153		5.410	
21.306	15.022		6.284	
16.898	10.614		6.284	
9.110	3.776	LR-K-84.xls sheet 'Test Tab'	5.334	LR-K-67_2nd.revised.xls sheet '1.Table 1'
5.443	0.967		4.476	
5.104	0.967		4.137	
Column 7				
32.438	23.148	LR-K-43, file STANDARD FLATS.xls, sheet 'CRA ADJ UNIT COSTS'	9.290	LR-K-67_2nd.revised.xls sheet '1.Table 1'
26.496	17.206		9.290	
23.818	14.528		9.290	
17.876	8.586		9.290	
9.146	3.003	LR-K-84.xls sheet 'Test Tab'	6.143	
5.843	1.234		4.609	
5.397	1.234		4.163	
Column 11				
26.100	16.810	LR-K-43, file STANDARD FLATS.xls, sheet 'CRA ADJ UNIT COSTS'	9.290	LR-K-67_2nd.revised.xls sheet '1.Table 1'
17.490	8.200		9.290	

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

VP/USPS-T28-51. In presort-tree form, Chart Nos. 1 and 2 attached show costs (cents per piece), workshare-related and not, as appropriate, for Standard Regular (above the uneven line) and Standard ECR (below the uneven line) mail. Chart No. 1 is for the commercial category, and Chart No. 2 is for the nonprofit category. Both charts show PRC costs from Docket No. R2001-1, taken from library references filed by the Postal Service, plus PRC-LR-7.

The columns on each chart are labeled. Boxes with **one** layer set out either total or workshare-related costs, as appropriate. Boxes with **two** layers set out total costs on the top layer and workshare-related costs on the bottom layer. The largest boxes with **three** possible layers set out a cost difference in the top layer, with the second two layers empty. The arrows show the sources of the cost differences.

a. With respect to the columns labeled (i) barcode letter, (ii) letter, (iii) flat, and (iv) barcode flat, please confirm that the cost shown in each single-layer box is correct. If any are incorrect, please provide the correct cost and a reference to its source.

b. With respect to the columns labeled (i) letter and (ii) flat, please confirm that the unit cost in each of the double-layer boxes is correct. If any are incorrect, please provide the correct cost and a reference to its source.

RESPONSE:

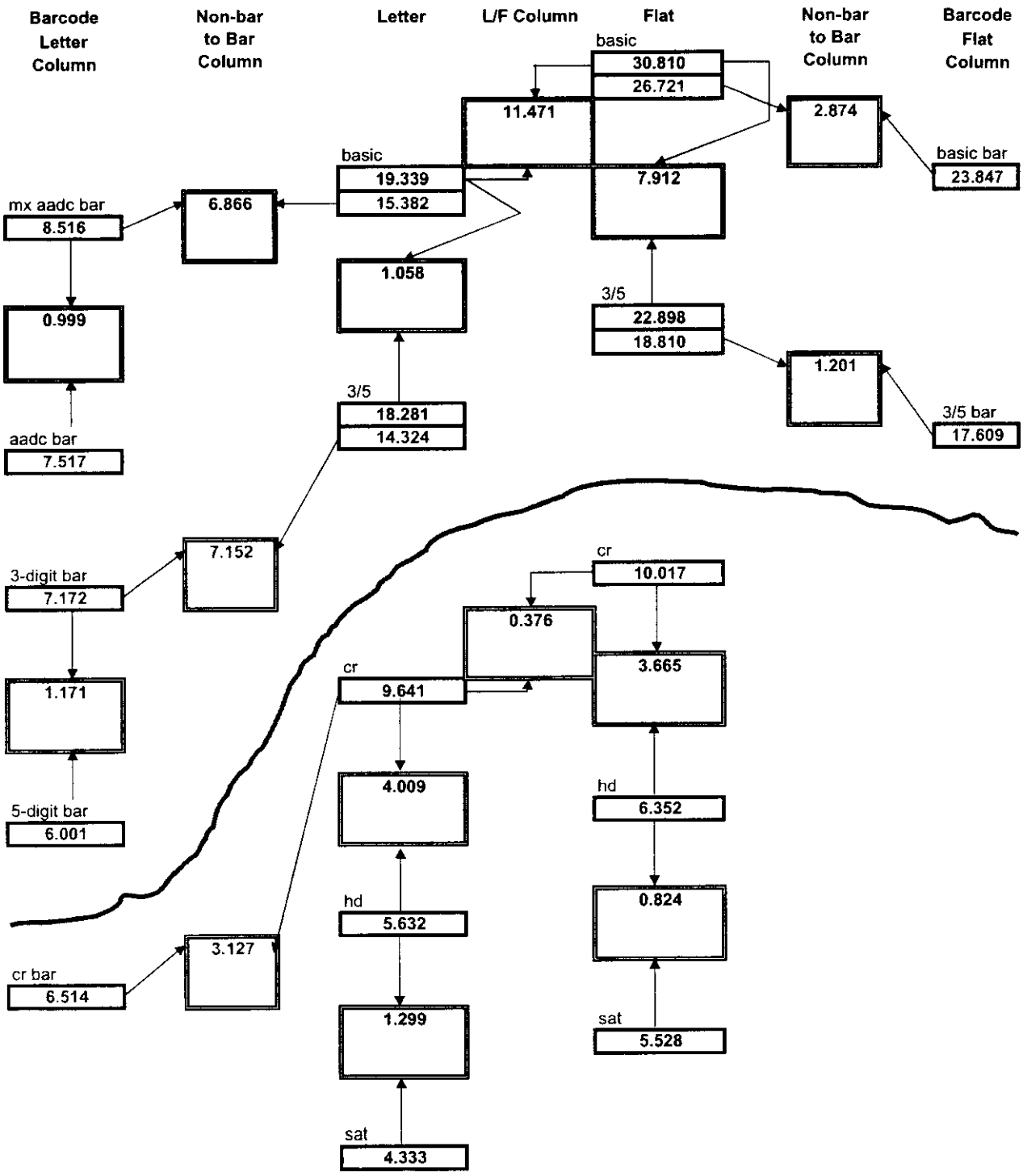
(a)-(b) Please see the attached charts, which have also been filed in Excel format.

Note the following:

- The mail processing and delivery unit cost values on rows 12-15 of the input table for Charts 1 and 2 (sheet 13 on the Excel file) have been changed to reflect the revised estimates in USPS-LR-J-84 as submitted on 11/15/01.
- Spreadsheet formulas have been added to link the cost values on the input sheet (sheet 13 on the Excel file) to the costs values on the presort tree sheets (sheets 7 and 8 on the Excel file). Accordingly, some of the cost values in the presort tree sheets have changed from those values originally submitted. The formulas within the presort trees used to calculate cost differentials have not been checked or confirmed.

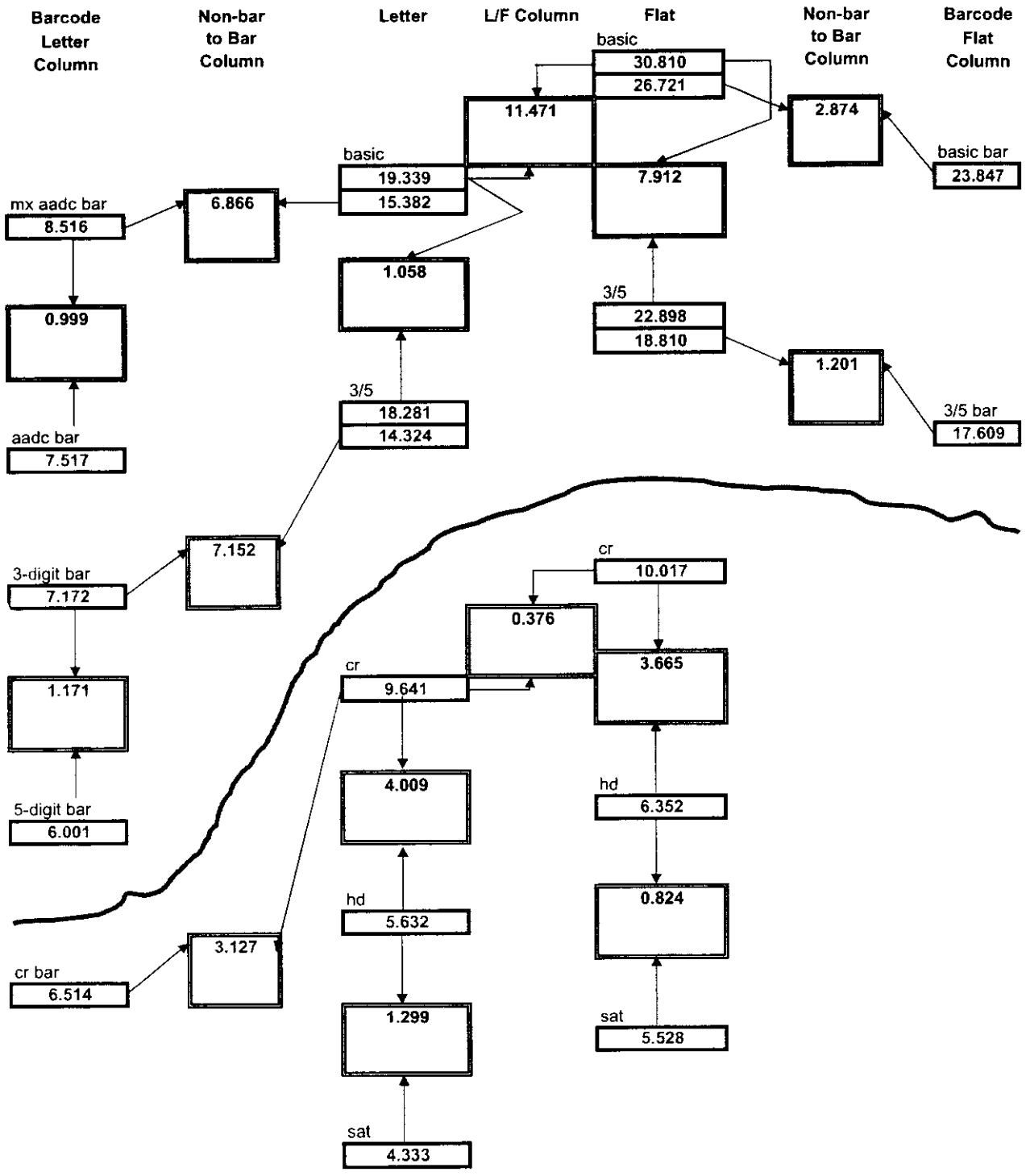
RESPONSE OF THE UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

Commercial Standard, PRC Costs, Docket No. R2001-1



RESPONSE OF THE UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

Nonprofit Standard, PRC Costs, Docket No. R2001-1



RESPONSE OF THE UNITED STATES POSTAL SERVICE TO VALPAK INTERROGATORY, REDIRECTED FROM WITNESS TAUFIQUE

Sources for figures in Charts 1 and 2 of Attachment to VP/USPS-T28-51

Figure Column 1	*Component* Mail Processing	Source	*Component* Delivery	Source
8.516	4.629	LR-J-84, revised 11/15/01, file STANDARD.xls, sheet 'LETTERS SUMMARY'	3.887	LR-J-84, revised 11/15/01, file STANDARD.xls, sheet 'LETTERS SUMMARY'
7.517	3.690		3.827	
7.172	3.360		3.812	
6.001	2.263		3.738	
6.514	1.625	USPS-LR-J-83, LR83ECR PRC.xls sheet 'Table 1'	4.889	Docket No. R2001-1, PRC-LR-7, sheet 'Table1'
Column 5				
19.339	15.133	LR-J-84, revised 11/15/01,file STANDARD.xls,	4.206	LR-J-84, revised 11/15/01, file STANDARD.xls, s
15.382	11.176	LR-J-84, revised file, 11/15/01, file STANDARD.xls, sheet 'LETTERS SUMMARY'	4.206	LR-J-84, revised 11/15/01, file STANDARD.xls, s
18.281	13.864	LR-J-84, revised 11/15/01, file STANDARD.xls,	4.417	LR-J-84, revised 11/15/01, file STANDARD.xls, s
14.324	9.907	LR-J-84, revised 11/15/01,file STANDARD.xls, sheet 'LETTERS SUMMARY'	4.417	LR-J-84, revised 11/15/01, file STANDARD.xls, s
9.641	2.987	USPS-LR-J-83, LR83ECR PRC.xls sheet 'Table 1'	6.654	Docket No. R2001-1, PRC-LR-7, sheet 'Table1'
5.632	0.684		4.948	
4.333	0.684		3.649	
Column 7				
30.810	22.370	USPS-LR-J-85, STANDARD.xls, sheet 'CRA ADJ UNIT COSTS'	8.440	Docket No. R2001-1, PRC-LR-7, sheet 'Table 1'
26.721	18.281		8.440	
22.898	14.458		8.440	
18.810	10.370		8.440	
10.017	3.649	USPS-LR-J-83, LR83ECR PRC.xls sheet 'Table 1'	6.368	Docket No. R2001-1, PRC-LR-7, sheet 'summary TY' cells F131-F133
6.352	1.189		5.163	
5.528	1.189		4.339	
Column 11				
23.847	15.407	USPS-LR-J-85, STANDARD.xls, sheet 'PRESORT LEVELS HELD CONSTANT'	8.440	Docket No. R2001-1, PRC-LR-7, sheet 'Table1'
17.609	9.169		8.440	

RESPONSE OF UNITED STATES POSTAL SERVICE
TO INTERROGATORY OF VALPAK DIRECT MARKETING SYSTEMS, INC. AND
VALPAK DEALERS' ASSOCIATION, INC., REDIRECTED FROM WITNESS LEWIS

VP/USPS-T30-18.

a. Does the Postal Service allow unaddressed letter-shaped mail to be accompanied by DALs? If not, why not?

b. Does the Postal Service allow unaddressed enveloped flats to be accompanied by DALs? If not, why not?

c. Does the Postal Service allow unaddressed catalogs to be accompanied by DALs? If not, why not?

RESPONSE:

a. No. To improve efficiency, the Postal Service's goal is to delivery point sequence as much letter mail as possible. Allowing letters to use DALs would be a step away from achieving that goal.

b. Yes.

c. Yes, if the catalog is flat-shaped (Standard Mail and Bound Printed Matter (BPM)) or parcel-shaped (BPM).

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS LEWIS

VP/USPS-T30-28.

a. For all classes of mail, what types of mailings must utilize DALs?
b. (i) In addition to whatever mailings you identified in response to preceding part a, for all classes of mail, what types of mailings may include DALs as an option?
(ii) Does the Postal Service allow letter-shaped mail to be accompanied by DALs? If not, why not?
(iii) Does the Postal Service allow enveloped flats to be accompanied by DALs? If not, why not?
(iv) Does the Postal Service allow unaddressed catalogs to be accompanied by DALs? If not, why not?

RESPONSE

a. Merchandise samples more than 5 inches wide (high) or 0.25 inch thick, or nonuniform in thickness, mailed at Standard Mail rates must be mailed with DALs when prepared for general distribution on city delivery routes. In this context, general distribution means distribution in a single mailing to at least 25 percent of the addresses in any 5-digit ZIP Code delivery area.
b. (i) The following additional items may be sent with DALs:
    - Mailings of unaddressed Periodicals or Standard Mail flats sent to at least 75 percent of the total addresses on a carrier route or 90 percent of the residential addresses on the route, whichever is less.
    - Merchandise samples for general distribution (as described in subpart (a)) to be delivered on other (i.e. not city delivery) routes, or for the residual portion of a general distribution mailing of merchandise samples.
    - Unaddressed pieces of Bound Printed Matter that are containerized as specified by the Postal Service in the Domestic Mail Manual.

    (ii) No. Please see the Postal Service's response to VP/USPS-T30-18, subpart (a), redirected from witness Lewis.

    (iii) Yes, subject to the qualifications described in subparts (a) and (b)(i) above. Please also see the Postal Service's response to VP/USPS-T30-18, subpart (b), redirected from witness Lewis. The same qualifications apply to that response.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO INTERROGATORY OF VALPAK, REDIRECTED FROM WITNESS LEWIS

(iii) Please see the Postal Service's response to VP/USPS-T30-18, subpart (c), redirected from witness Lewis.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO REQUEST OF VALPAK AT TR. 4/875

VALPAK REQUEST (TR. 4/875). USPS-LR-K-84 uses RPW pound by entry point data, and states that it is drawn from USPS-LR-K-87. We have been unable to find where in USPS-LR-K-87 that data are drawn. Please tell us exactly where in USPS-LR-K-87 you draw the pound data which we cannot locate.

RESPONSE:

The pound by entry point data used in USPS-LR-K-84 were developed from an intermediate data set that itself was prepared during the development of USPS-LR-K-87 but did not make the final tables of that library reference. Attached is a table containing the requested data.

RESPONSE OF THE UNITED STATES POSTAL SERVICE TO REQUEST OF VALPAK AT TRANSCRIPT 4/875

FY04 Standard ECR Mail RPW Weights (pounds) - Commercial and Nonprofit

Presort		*Drop Ship Category*				
Level	Shape	None	DBMC	DSCF	DDU	Total
Basic	Letters	13,889,306	17,025,488	49,765,717	5,249,712	85,930,223
	Flats	97,558,488	341,366,086	2,218,775,553	49,513,958	2,707,214,084
	Parcels	246,237	12,395	37,730	5,031	301,392
	Total	111,694,030	358,403,969	2,268,579,000	54,768,701	2,793,445,700
High Density	Letters	1,385,056	1,029,832	20,674,720	3,730,945	26,820,552
	Flats	2,980,387	3,752,022	177,542,748	255,351,888	439,627,046
	Parcels	3,337	0	156	0	3,493
	Total	4,368,780	4,781,854	198,217,624	259,082,833	466,451,091
Saturation	Letters	11,823,285	6,798,882	151,824,167	41,394,380	211,840,714
	Flats	47,043,048	16,566,764	466,094,949	1,285,409,166	1,815,113,927
	Parcels	752	0	134,971	4,467	140,189
	Total	58,867,084	23,365,646	618,054,087	1,326,808,013	2,027,094,830
Basic Auto	Letters	10,594,921	27,467,293	43,901,237	1,286,727	83,250,178
	Flats	0	0	0	0	0
	Parcels	0	0	0	0	0
	Total	10,594,921	27,467,293	43,901,237	1,286,727	83,250,178
USPS-LR-K-84 Breakout						
Saturation	Letters	13,208,340	7,828,714	172,498,887	45,125,325	238,661,266
	Flats	50,023,435	20,318,786	643,637,697	1,540,761,054	2,254,740,973
	Parcels	4,088	0	135,127	4,467	143,682
	Total	63,235,864	28,147,500	816,271,711	1,585,890,846	2,493,545,921
Non-Saturation	Letters	24,484,227	44,492,781	93,666,954	6,536,439	169,180,401
	Flats	97,558,488	341,366,086	2,218,775,553	49,513,958	2,707,214,084
	Parcels	246,237	12,395	37,730	5,031	301,392
	Total	122,288,951	385,871,262	2,312,480,237	56,055,428	2,876,695,878

Source of RPW Weights: USPS-LR-K-87, workbook 'Standard Weight Summary.xls', worksheets 'Std Reg' and Std NP'
Uses columns F (Shape), H (Presort), and I (Drop) to sum the RPW weights (column C) to shape, presort level, and drop ship category within each worksheet.
Standard ECR and NECR weights are added together to create this table. Also note that, for the Basic Auto presort level, all pieces are considered letters for the purposes of USPS-LR-K-84.

RESPONSE OF THE UNITED STATES POSTAL SERVICE
TO REQUEST OF VALPAK AT TR. 4/888-89

VALPAK REQUEST (TR. 4/888-89). Please look to make sure that your response to VP/USPS-T26-3(c)(iv), which states that the Postal Service has no estimates of how the shift of additional Standard ECR letters into the DPS mail processing stream affects ECR mail processing costs, is accurate. If such an estimate is found, please provide it for the record.

RESPONSE:

The Postal Service adheres to its response to VP/USPS-T26-3(c)(iv).

Postal Rate Commission
Submitted 7/8/2005 4:22 pm
Filing ID: 45930
Accepted 7/8/2005

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268–0001

POSTAL RATE AND FEE CHANGES PURSUANT TO PUBLIC LAW 108-18	Docket No. R2005-1

NOTICE OF FILING BY THE UNITED STATES POSTAL SERVICE OF BRMAS STATEMENTS IN RESPONSE TO REQUEST OF MAJOR MAILERS ASSOCIATION DURING HEARING ON WITNESS HATCHER'S TESTIMONY (USPS-T-22) at TR. 4/836, 840

As directed by the Presiding Officer (Tr. 4/840), the United States Postal Service hereby files three BRMAS statements in response to a request by the Major Mailers Association during the June 29, 2005 hearing on the testimony of witness Hatcher (see Tr. 4/836).

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking

Nan K. McKenzie

475 L'Enfant Plaza West, S.W.
Washington, D.C. 20260–1137
(202) 268–3089; Fax –5402
July 8, 2005

POSTAGE DUE STATEMENT FOR AUTOMATED BRM

Customer	Perm./Acct.	Finance #	Date
[redacted]	[redacted]	18-2412	JUL 4,2005
[redacted]		** DOCUMENT SUBJECT TO AUDIT **	
SAME C/O CDS		Amount below to be included in normal bill	

ZIP Description Bin ZIP Code BRM Category	Count	Postage	BRM Fee	TOTAL Due
[redacted]				
111 503500084 HV 1oz Ltr	311	105.740	2.488	108.228
[redacted]				
110 503500703 HV 1oz Ltr	773	262.820	6.184	269.004
[redacted]				
103 503500938 HV 1oz Ltr	285	96.900	2.280	99.180
[redacted]				
106 503501300 HV 1oz Ltr	315	107.100	2.520	109.620
[redacted]				
116 503501688 HV 1oz Ltr	182	61.880	1.456	63.336

	BRM Qualified	NON-Qualified
Totals for: HV 1oz Ltr	1,866	0

AUTOMATED TOTALS:	1,866	634.440	14.928	649.368

PS Form 3611 April 2002

Billed 6-16-05 [redacted] Thur.

POSTAGE DUE STATEMENT FOR AUTOMATED BRM

Customer	Perm./Acct.	Finance #	Date
[redacted]	[redacted]	1824-12	JUN 16,2005

** DOCUMENT SUBJECT TO AUDIT **
Amount below to be included in normal bill

ZIP Bin	ZIP Code	BRM Category	Count	Postage	BRM Fee	TOTAL Due
[redacted]						
070	503801400	HV Cards	2	0.400	0.016	0.416
[redacted]						
085	503811400	HV 1oz Ltr	5,828	1,981.520	46.624	2,028.144

	BRM Qualified	NON-Qualified
Totals for: HV Cards	2	0
Totals for: HV 1oz Ltr	5,828	0

AUTOMATED TOTALS:	5,830	1,981.920	46.640	2,028.560

PS Form 3611 April 2002

POSTAGE DUE STATEMENT FOR AUTOMATED BRM

Customer	Perm./Acct.	Finance #	Date
[redacted]	[redacted]	18-2412	JUL 1,2005
[redacted]	** DOCUMENT SUBJECT TO AUDIT **		
CDS DUES	Amount below to be included in normal bill		

ZIP Description Bin ZIP Code BRM Category	Count	Postage	BRM Fee	TOTAL Due
[redacted]				
121 503500431 QBRM 1oz Ltrs	504	171.360	30.240	201.600
[redacted]				
119 503500476 QBRM 1oz Ltrs	2,057	699.380	123.420	822.800
[redacted]				
099 503501343 QBRM 1oz Ltrs	266	90.440	15.960	106.400

	BRM Qualified	NON-Qualified
Totals for: QBRM 1oz Ltrs	2,827	0

AUTOMATED TOTALS:	2,827	961.180	169.620	1,130.800

PS Form 3611 April 2002

RESPONSE OF POSTAL SERVICE WITNESS JOHN KELLEY TO ORAL REQUEST OF VALPAK

Q. Tr. 7/3014-17. Please provide a DPS and NonDPS unit delivery cost for Standard Regular letters and ECR Saturation letters.

Response

Please refer to the attached sheets (and the attached electronic Excel file) for the requested information for Standard and ECR.

BY04 COSTS AND VOLUMES	($000s)	($000s)	($000s)	($000s)	($000s)	($000s)	($000s)	($000s)	(000s)			($0.000)
Mail Category	6.1 IN-OFFICE DIRECT LABOR, CASING	6.1 IN-OFFICE DIRECT LABOR, NON-CASING	6.2 IN-OFFICE OVERHEAD, PLUS THE PORTION OF IN-OFFICE DELIVERY PREP THAT IS BURDENED ON OFFICE DIRECT	STREET DELIVERY ACTIVITIES	10 RURAL CARRIERS	TOTAL PIGGYBACKED CITY CARRIER COSTS	TOTAL PIGGYBACKED RURAL CARRIER COSTS	GRAND TOTAL PIGGYBACKED COSTS	PERMIT VOLUME	UNIT CITY DELIVERY COST	UNIT RURAL DELIVERY COST	UNIT TOTAL DELIVERY COST
Regular Standard - Non DPS Lettter Pieces	350,557	6,378	97,511	114,268	156,479	708,178	183,899	892,077	8,559,745	$0.0827	$0.0215	$0.1042
Regular Standard Letters Subclass - DPS Letter Pieces	0	29,474	8,052	528,076	132,729	704,304	155,987	860,291	39,557,969	$0.0178	$0.0039	$0.0217
Regular Standard Letters Subclass - All Lettter Pieces	350,557	35,852	105,563	642,344	289,207	1,412,481	339,886	1,752,367	48,117,714	$0.0294	$0.0071	$0.0364

BY04 COSTS AND VOLUMES	($000s)	($000s)	($000s)	($000s)	($000s)	($000s)	($000s)	($000s)	(000s)			($0.000)
Mail Category	6.1 IN-OFFICE DIRECT LABOR, CASING	6.1 IN-OFFICE DIRECT LABOR, NON-CASING	6.2 IN-OFFICE OVERHEAD, PLUS THE PORTION OF IN-OFFICE DELIVERY PREP THAT IS BURDENED ON OFFICE DIRECT	STREET DELIVERY ACTIVITIES	10 RURAL CARRIERS	TOTAL PIGGYBACKED CITY CARRIER COSTS	TOTAL PIGGYBACKED RURAL CARRIER COSTS	GRAND TOTAL PIGGYBACKED COSTS	PERMIT VOLUME	UNIT CITY DELIVERY COST	UNIT RURAL DELIVERY COST	UNIT TOTAL DELIVERY COST
ECR Saturation Letters Subclass - NonDPS Letter Pieces	$ 25,600	$ 1,383	$ 7,376	$ 34,704	$ 20,445	$ 86,375	$ 24,028	$ 110,403	2,774,792	$ 0.0311	$ 0.0087	$ 0.0398
ECR Saturation Letters Subclass - DPS Letter Pieces	$ -	$ 542	$ 148	$ 26,202	$ 4,571	$ 33,632	$ 5,372	$ 39,004	1,051,452	$ 0.0320	$ 0.0051	$ 0.0371
ECR Saturation Letters Subclass - All Letter Pieces	$ 25,600	$ 1,925	$ 7,524	$ 60,906	$ 25,017	$ 120,007	$ 29,400	$ 149,407	3,826,244	$ 0.0314	$ 0.0077	$ 0.0390